

South Oxfordshire Local Plan Proposed Main Modifications Consultation Comment Form

Please return by midnight on Monday 2 November 2020 via email planning.policy@southoxon.gov.uk or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)

This form has two parts:
Part A – contact details
Part B – your comments

Part A

Are you responding as an: (please tick)

Individual

Business or organisation

Agent

A name and contact details are required for your comments to be considered.

1. Personal Details

2. Agent Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text"/>
Full Name	<input type="text" value="Paul Boone"/>	<input type="text"/>
Organisation (if relevant)	<input type="text" value="Chalgrove Airfield Action Group"/>	<input type="text"/>
Job Title (if relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Postcode	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Telephone Number	<input type="text" value="[REDACTED]"/>	<input type="text"/>
Email Address	<input type="text" value="[REDACTED]"/>	<input type="text"/>

Sharing your personal details

Your name, contact details and comments will be shared with the Planning Inspector and a Programme Officer, who acts as a point of contact between the Council, Inspector and respondents.

This means that you may be contacted by the Programme Officer or the Council with updates and in relation to any necessary consultations on the Local Plan. This is in accordance with Regulation 19 and 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 102 of The Conservation of Habitats and Species Regulations 2017.

We have received assurance that the data passed to the Planning Inspector and Programme Officer will be kept securely and not used for any other purpose. The Inspector and Programme Officer will retain the data up to six months after the plan has been adopted.

Comments submitted by individuals will be published on our website, alongside their name. No other contact details will be published. Comments submitted by businesses and/or organisations will be published, including contact details.

Please refer to our Privacy Notice regarding how your personal data is used for this consultation, available on our website southoxon.gov.uk/newlocalplan. If you would like to know more about the councils data protection registration or to find out about your personal data, please visit: southoxon.gov.uk/dataprotection

Future contact preferences

As explained above, in line with statutory regulations, you will be contacted by the Programme Officer (and where necessary the Council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy consultation database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

Part B – Please use a separate sheet for commenting on each proposed main modification or consultation document

You can provide your comments on the Emerging South Oxfordshire Local Plan Proposed Main Modifications in this section.

The list of documents you can comment on are:

- Schedule of Proposed Main Modifications
- Schedule of Policies Map Changes
- Sustainability Appraisal Report Addendum
- Habitats Regulations Assessment Addendum

Please note we are inviting comments on the Proposed Main Modifications and documents listed above only - this is not an opportunity to make comments on any other part of the Plan.

If you are commenting on the Main Modification document, please provide the main modification number (for example MM1) in the box below.

If you are unsure of the 'modification number', please refer to the Schedule of Proposed Main Modifications.

If you are commenting on any of the other consultation documents (for example the Sustainability Appraisal Addendum), please provide the relevant section, paragraph or page number in the box below:

Modification Number or
Document, section, paragraph or page
number

Please see attached document

Please provide your comments below:

If your comments are over 500 words it would be really helpful if you could also provide a summary of your comments using the text box in the next question.

If you wish to include any supporting documents, please attach them to this comment form.

Please see attached document.

(Continue on page 5 if necessary)

If your comments cover more than the boxes provided, please use the space below to provide a summary. You are not required to summarise your comments, but a summary would help us in our reporting.

Please provide your summary below:

Thank you for your comments.

Please return by midnight on Monday 2 November 2020 via email planning.policy@southoxon.gov.uk or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)



Chalgrove Airfield Action Group

South Oxfordshire District Council
 135 Eastern Avenue
 Milton Park
 Milton
 OX14 4SB

1st November 2020

Reference: Local Plan Main Modification Consultation

Main Mod. No.	Para / Section	Page No.	Main Modification	Comments
MM2	Objective 8.2	23	Minimise carbon emissions and other pollution such as water, air, noise and light, and increase our resilience to the likely impact of climate change, especially flooding. <u>Lower energy use and support an increase in renewable energy use. Support growth in locations that help reduce the need to travel</u>	Agree. Comment: This modification needs to be related to the specific areas in the Local Plan that need it. For example, Chalgrove is not a location that helps reduce the need for travel, and therefore contradicts this clause.
MM3	4.9	27	New bullet: <u>Contribute to tackling climate change</u>	Agree. Comment: The clause must specify what this actually means, and what

				specific goals/targets and measurements are included, for example – reduction in CO2 by X%
MM4	n/a	28	New paragraph following 4.10 - <u>The spatial strategy supports growth in locations that help reduce the need to travel such as the focus at Science Vale, Towns and larger villages as well as allocations adjacent to the City of Oxford. Appendix 16 of the Local Plan highlights all elements of the Local Plan where the Plan helps to minimise carbon emissions, lower energy use and help to reduce the need to travel.</u>	Agree. Comment: The selection of Chalgrove Airfield contradicts this clause.
MM4	n/a	28	New bullet: · <u>Contributing to tackling climate change</u>	Agree. Comment – when tackling Climate Change, what does this mean in practical terms? What are the targets? Below are some pictures of Chalgrove taken in October 2020 after a couple of days of rain – how does development at Chalgrove Airfield support tackling Climate Change, when the Airfield is an aquifer with a very high water table?



				
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			<p>2. Housing requirements · South Oxfordshire Minimum Housing Requirement- 18,600 between 1 April 2011 and 31 March 2035</p> <p>4,950 homes addressing Oxford's unmet housing need</p> <p>Total housing requirement for the plan period 23,550 homes</p> <p>The annual requirement is as follows:</p> <ul style="list-style-type: none"> • 2011/12 to 2025/26- 900 homes per annum. • 2026/27 to 2031/32-1,120 homes per annum • 2032/33 to 2034/35- 1,110 homes per annum. 	<p>Comment: How does this total square with 5.11, which calls for 28,465? Which is correct?</p>
MM7	5(ix) [new]	40	<p>New criterion: <u>ix) a statement of how it is intended to achieve low carbon emissions and facilitate renewable energy generation</u></p>	<p>Agree, but does this include the carbon emissions from the building process as well as the ongoing emissions from housing, infrastructure, and car-based transport?</p>
MM7	6(ix) [new]	40	<p>New criterion: <u>ix) Low carbon development and renewable energy</u></p>	<p>Agree, but does this include the carbon emissions from the building process as well as the ongoing emissions from housing and infrastructure?</p>
MM8	n/a	41	<p><u>1.Planning permission will only be granted where it can be demonstrated that the proposal optimises the use of land and potential of the site. Developments should accommodate and sustain an appropriate amount and mix of uses (including green space and other public space) and support local facilities and</u></p>	<p>Object. This contradicts the Council's own objective 5.2 Support development that respects the scale and character of our towns and villages, enhancing the special character of our historic settlements and the surrounding countryside. For</p>

		<p><u>transport networks.</u></p> <p><u>2.The density of a development should be informed by:</u></p> <ul style="list-style-type: none"> <u>•the capacity of the site and the need to use land efficiently in accordance with Policy DES8: Efficient use of resources;</u> <u>•the need to achieve high quality design that respects local character;</u> <u>•local circumstances and site constraints, including the required housing mix, and the need to protect or enhance the local environment, Areas of Outstanding Natural Beauty, heritage assets, and important landscape, habitats and townscape;</u> <u>• the site's (or, on strategic allocations, the relevant part of the site's) current and future level of accessibility to local services and facilities by walking, cycling and public transport; and</u> <u>•the need to minimise detrimental impacts on the amenity of future and/or adjoining occupiers.</u> <p><u>3. Sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City should be capable of accommodating development at higher densities. It is expected that these sites will accommodate</u></p>	<p>villages, even the larger villages, higher densities do not reflect the scale and character. The statement "Sites well related to existing towns and villages and served by Public Transport" needs to be properly defined. What does "served" mean? What level of public transport provision equates to "served"?</p> <p>Section 4 – strongly object. This just gives developers a licence to ignore the current character of a village and build something wholly inappropriate adjacent to it.</p> <p>Section 5 – agree, but only where a masterplan or a Design and Access Statement is factually correct and does not distort or spin the actual situation. For an example of this, see the Planning Application for Chalgrove Airfield, which is riddled with errors and outright falsehoods.</p>
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			<p><u>densities of more than 45 dph (net) unless there is a clear conflict with delivering a high-quality design or other clearly justified planning reasons for a lower density.</u></p> <p><u>4. Given the size, function and location of the strategic allocations it may be more appropriate for these sites to create a new character rather than trying to reflect or scale up the existing local character.</u></p> <p><u>5. Applicants should demonstrate that a scheme makes the optimal use of the site as part of the masterplan or Design and Access Statement, where these are required to support a planning application.</u></p>	
MM10	n/a	46	Amendment to concept plan to reflect changes to the site policy (see Appendix A attached for change)	Object. The Concept Plan for Chalgrove Airfield remains inaccurate.
MM10	1	46	1.Land within the strategic allocation at Chalgrove Airfield will be developed to deliver approximately 3,000 new homes with at least <u>2,105</u> to be delivered within the plan period, 5 hectares of employment land, 3 pitches for Gypsies and Travellers, <u>education facilities, public open spaces, retail</u> and supporting services and <u>other community</u> facilities.	Object. This amendment utilises the Homes England timetable, which is unrealistic.
MM10	2(viii)	47	viii) provision of convenience <u>and comparison</u> floorspace that to meets the day-today needs of <u>Chalgrove and</u> the <u>wider</u> local community only	Strongly object to this change. By setting up Chalgrove as a retail centre for the wider local community,

			<p>without impacting on the vitality and viability of existing centres in accordance with Policy TC2 – Retail Hierarchy;</p>	<p>and removing the protection for other local retail centres, two things will happen – one will be the significant degradation of retail provision in local settlements such as Watlington, as well as Wallingford and Thame; the second will be the additional traffic accessing Chalgrove. This has not been accounted for in any of the traffic models; therefore the traffic models will have to be repeated with the additional traffic numbers accounted for.</p> <p>For sites such as Berinsfield, the wording states: v) provision of convenience floorspace that meets the day-to-day needs of the local community only without impacting on the vitality and viability of existing centres in accordance with Policy TC2 – Retail Hierarchy; why is this appropriate for Berinsfield, and not Chalgrove?</p> <p>Para 121 of the NPPF permits new shopping centres “provided this would not undermine key economic sectors or sites or the vitality and viability of town centres”. This change</p>
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				contradicts the NPPF, and SODC Policy TC1, and should be removed.
MM10	2(ix)c	47	c. improvements to the Public Transport network through significant contributions to new or improved services to include but not limited to increased frequency on the Chalgrove to Oxford bus route of up to 4 buses per hour to be supported by highway improvements on the B480 corridor, and support for an east west bus service linking Chalgrove to Didcot (and where appropriate feasible other significant employment and growth areas) with a target frequency of 2 buses per hour	<p>Object. SODC have stated that this site is not for the Oxford unmet housing need, it is for the rest of the District. It must therefore be a requirement that bus travel is required from the outset to the other Market Towns such as Wallingford, Thame, and Henley.</p> <p>It must also be a requirement that the cost of this service must be clarified, in terms of who pays for it, for how long, and at what cost. It is clear from the response to the Consultation from the Oxford Bus Company and Thames Travel and Stagecoach in Oxfordshire that the operators of the service believe that the proposals are unsustainable currently unsustainable.</p>
MM10	2(ix)d	48	d. encourages cycling and walking and provides links through the site and to adjacent employment and into the village of Chalgrove and <u>to other local destinations by providing new connections or improving the existing public rights of way network</u>	Object. This clause is fine in principal, but there are no existing cycle routes in the vicinity, therefore it is not possible to connect to them. None of the routes planned meet the requirement of Oxfordshire County

				Council's LTP4 for cycling distances of 5-10 miles maximum. Therefore, this clause cannot be achieved for this site.
MM10	2(x111)[new]	48	New criterion: xiii) <u>Low carbon development and renewable energy in accordance with STRAT4</u>	Agree, but needs to be defined. Low Carbon based on which standards? To include construction materials or just houses? What percentage of renewable energy?
MM10	3	48	3.The proposed development at Chalgrove Airfield will deliver a scheme in accordance with an agreed comprehensive masterplan taking into consideration the <u>indicative</u> concept plan. The masterplan must be prepared in collaboration and agreed with the Local Planning Authority. The proposals will be expected to deliver a masterplan that demonstrates:	Object. Why is the concept plan "indicative"? This has been going on for four years; is the developer unable to provide an accurate concept plan?
MM10	3	48	vi) respects the setting of the Listed Buildings and the Registered Battlefield (Battle of Chalgrove 1643). <u>addresses heritage assets and their settings in accordance with Policies ENV6 to ENV10 of this Plan and the NPPF.</u>	Support, apart from the removal of the specific Battle of Chalgrove reference. Why does this not say "including but not limited to the Battle of Chalgrove 1643 site?"
MM10	3(vii)[new]	48	New criterion - <u>vii)a layout that delivers higher density development (a minimum of 50 dph) in and around the local centre and along key public transport routes. Density should then gradually reduce from these locations outwards to provide a transition across the site, with lower density development located on the edges of the site, to minimise the landscape and heritage impact of the development and support the integration of the development with</u>	Strongly object. This directly contradicts Objective 5.2. This scale of development, and this density of development, does not reflect the setting of the village. In addition, the construction of high density housing in the centre of the development will be directly affected by the re-routed B480, creating a canyon-effect that

			<u>the existing settlement. The average density for the whole site will be between 35 and 50 dph;</u>	will directly lead to increased atmospheric pollution from passing traffic forced to traverse the centre of the development.
MM10	3(viii-ix) [new]	48	New criteria - <u>viii)high quality walking and cycling routes within the site;</u> <u>ix)provision of infrastructure to support public transport through the site.</u>	Support
MM10	3(x) [new]	48	New criterion: <u>x)a net gain in biodiversity which is integrated into the masterplan through the creation of priority habitats, and significant native tree planting, with any residual impacts offset through the ecological improvement of a named site in South Oxfordshire under the promoter's control in line with an agreed management plan or a recognised biodiversity offsetting scheme.</u>	Object, unless the offset is like-for-like. Comment: Please advise how "significant native tree planting" is compatible with the adjacent airfield operation? Please also explain how these "priority habitats" and woodland will replace the open grassland habitat that will be lost – this is not a "like-for-like" transition. Please also define the offset scheme, and what is expected to be delivered when it is already clear from the Planning Application that the current biodiversity loss will be approx. 90%? Does the "named site" exist, and if so, how compatible is it with recreating the open grassland habitat?
MM49	3	150	Add the following point to the end of point 3; <u>'This applies equally where external funding for infrastructure necessary for development has been secured (including where the infrastructure is delivered ahead of development), on the</u>	Comment: This can only apply if the developer has already agreed to contribute. This cannot be achieved retrospectively.

			<u>expectation that funding shall be recovered from development</u> '.	
MM49	7.1	147	Good connections and high quality infrastructure are essential to our quality of life. We need to travel to work, school, shops, leisure and health facilities. a thriving economy needs good connections to operate efficiently. These can range from the strategic road and rail network, to our ability to access the internet with the benefits that it can offer to work from home and provide services. Improving accessibility to services and employment is fundamental to sustainable development and to meeting the objectives of this Plan. The challenge is to do this in a way that minimises the impact of the transport system on the environment <u>whilst encouraging development that actively supports walking, cycling and public transport to minimise the need to travel</u> , and provides for necessary improvements in a cost effective way.	Support. This test needs to be applied evenly to all sites, and sites where this cannot be achieved in any reasonable way should be removed from the Local Plan.
MM49	n/a	149	Add the following paragraph following 7.10; <u>'Where funding is secured for infrastructure, there will be an expectation that funding will be recovered and recycled and obtained from developer contributions retrospectively. Where forward funding is secured it will not circumvent the need for a development to contribute towards the cost of such infrastructure if such infrastructure is relevant to the development of the site. Infrastructure and services required as a</u>	Comment: This can only apply if the developer has already agreed to contribute. This cannot be achieved retrospectively.



			<u>consequence of development, and provision for their maintenance, will be sought from developers, and secured through developer contributions.</u>	
MM51	1(x)[new]	152	New criterion - <u>x) Support for the delivery of the Cowley Branch Line</u>	Support.
MM53	8.10	170	Trees and hedgerows, individually and collectively, can make an important contribution to biodiversity and the landscape. They also absorb atmospheric pollution and have a beneficial influence on the climate. <u>Development proposals should provide a net increase in canopy cover where possible. All developments should seek to include a wide range of long lived, large canopied trees species to achieve a net increase in canopy cover overall.</u>	Object in respect of STRAT7. This site is predominantly undisturbed open grassland, which is a rare habitat in South Oxfordshire. Native species which rely on this open aspect, such as skylark, will not thrive in woodland habitat. This proposal is too broad-brush for STRAT7, where large canopied trees are contra-indicated, such as in the vicinity of an airfield, where they will increase the number of flocking birds and significantly increase the risk to human health due to bird strike. STRAT7 does not fit the climate emergency requirements and should be removed.
MM57	n/a	178-179	1. The Council will seek to protect, conserve and enhance the District's historic environment. This includes all heritage assets including historic buildings and structures, Conservation Areas, landscapes and archaeology. <u>Proposals for new development that may affect designated and non-designated heritage assets must demonstrate that they protect, conserve and/or enhance the District's historic environment. Heritage assets include statutorily designated scheduled monuments, listed buildings or structures.</u>	Support.



			<p><u>Conservation Areas, Registered Parks and Gardens, Registered Battlefields, archaeology of national and local interest and non-designated buildings, structures or historic landscapes that contribute to local historic and architectural interest of the District's historic environment, and also includes those heritage assets listed by the Oxfordshire Historic Environmental Record.</u></p>	
MM63	n/a	198	<p>1. All new development must be of a high quality design that: reflects the positive features that make up the character of the local area and both physically and visually enhances and compliments the surroundings.</p> <ul style="list-style-type: none"> i) <u>uses land efficiently whilst respecting the existing landscape character;</u> ii) <u>enhances biodiversity and, as a minimum, leads to no net loss of habitat;</u> iii) <u>incorporates and/or links to a well-defined network of green and blue infrastructure;</u> iv) <u>is sustainable and resilient to climate change;</u> v) <u>minimises energy consumption;</u> vi) <u>mitigates water run-off and flood risks;</u> vii) <u>takes into account landform, layout, building orientation, massing and landscaping;</u> 	<p>Support</p> <p>Comment: Ref ii – if a site does led to a loss of habitat, it must be replaced by like-for-like habitat. Replacing open grassland with trees, for example, is not acceptable.</p> <p>Comment: Ref xviii – where a planning application is responded to by the Police, and the design has not taken into account good design to reduce the likelihood of crime and antisocial behaviour, that site should be rejected until such time as the requirements are met.</p>



			<ul style="list-style-type: none"> viii) <u>provides a clear and permeable hierarchy structure of streets, routes and spaces to create safe and convenient ease of movement by all users;</u> ix) <u>ensures that streets and spaces are well overlooked creating a positive relationship between fronts and backs of buildings;</u> x) <u>clearly defines public and private spaces;</u> xi) <u>provides access to local services and facilities and, where needed, incorporates mixed uses, facilities and co-locates services as appropriate with good access to public transport;</u> xii) <u>provides a wide range of house types and tenures;</u> xiii) <u>respects the local context working with and complementing the scale, height, density, grain, massing, type, details of the surrounding area;</u> xiv) <u>secures a high quality public realm that is interesting and aesthetically pleasing; and designed to support an active life for everyone with well managed and maintained public areas;</u> xv) <u>does not differentiate between the design quality of market and affordable housing or the adjacent public realm;</u> 	
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			<p>xvi) <u>is designed to take account of possible future development in the local area;</u></p> <p>xvii) <u>understands and addresses the needs of all potential users by ensuring that buildings and their surroundings can be accessed and used by everyone;</u></p> <p>xviii) <u>creates safe communities and reduces the likelihood of crime and antisocial behaviour as well as the fear of crime itself;</u></p> <p>xix) <u>ensures a sufficient level of well-integrated and imaginative solutions for car and bicycle parking and external storage including bins.</u></p> <p>2 All proposals must be accompanied by a constraints and opportunities plan and design rationale. Important landscape and built features both within and adjacent to the site should be retained as part of a proposal.</p> <p>3. Planning permission will only be granted where proposals are designed to meet the key design objectives and principles for delivering high quality development set out in the South Oxfordshire Design Guide.</p>	
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			<p>4. New development should be designed to ensure that buildings and their surrounding spaces can be accessed and used by everyone and promote and safe environments that reduce the opportunity for crime as well as the fear of crime itself.</p> <p>2. 5. Where development sites are located adjacent to sites that have a reasonable prospect of coming forward in the future, integration with the neighbouring site should form part of the proposal's design.</p> <p>3. 6. Where the Council is are aware that sites with similar delivery timescales are coming forward together, they will require a <u>coordinated, integrated</u> and comprehensive masterplan <u>will be required</u> to be prepared across all <u>the</u> sites.</p>	
MM64	n/a	199	<p><u>1. All new development must be designed to reflect the positive features that make up the character of the local area and should both physically and visually enhance and complement the surroundings.</u></p> <p>12. All proposals for new development should include be informed by a contextual analysis that demonstrates how the design:</p>	<p>Support:</p> <p>Comment – where a character assessment has been prepared as part of a made Neighbourhood Development Plan, and a Planning Application is submitted which does not demonstrate that the positive features have been incorporated, that Application should be refused.</p>



			<p>i) has been informed by and responds positively to the site and its surroundings; and</p> <p>ii) reinforces place-identity by enhancing local character.</p> <p>23. Where a character assessment has been prepared as part of a made Neighbourhood Development Plan, a proposal must demonstrate that the positive features identified in the assessment have been incorporated into the design of the development.</p> <p>34. Where there is no local character assessment a comprehensive contextual analysis of the local character should be prepared as part of an application. This should identify the positive features that make up the character of the area. The proposal must demonstrate that these positive features have been incorporated into the design of the development</p> <p>45. Proposals that have the potential to impact upon a conservation area or the setting of a conservation area should also take account of the relevant Conservation Character Appraisal.</p>	
MM65	n/a	201	<p>1. Where an application is required to be supported by a Design and Access Statement, this must demonstrate how the development proposal meets the key design objectives of the South Oxfordshire Design Guide and the design criteria set out in Part 2 of the Guide.</p>	<p>Comment: What level of testing is defined to ensure that the Design and Access Statement is accurate and truthful? Certainly the Planning Application for STRAT7 has a Design and Access Statement that is inaccurate in large parts.</p>



			<p>2. The Design and Access Statement should be proportional to the scale and complexity of the proposal. It should include:</p> <p>i) a clear drawing trail that showing how the design of the proposal development and the rationale behind it has evolved and clearly demonstrating that the key design objectives and principles set out in the South Oxfordshire Design Guide have been considered at the outset and throughout the process and have been met by the final design;</p> <p>ii) <u>a constraints and opportunities plan that clearly informs the design process and final design;</u></p> <p>iii) the delivery implementation phases and strategies to be put in place to ensure the timely delivery of infrastructure and services when they are needed by new residents; and</p> <p>iv) how consultation with the existing community and communities in the surrounding area has informed the design of the development.</p>	
MM66	n/a	202	<p><u>ix) demonstrate that it has been prepared with the involvement of the local community and other stakeholders and in consultation with the Local Planning Authority.</u></p>	<p>Support:</p> <p>Comment: Where it can be clearly demonstrated that the views of the local community have been ignored</p>



				and sidelined, what value does this clause have? Simply presenting plans at a public consultation, and ignoring all comments from the local community, does not demonstrate "involvement"
MM66	9.16	203	Masterplans should be produced in consultation with South Oxfordshire District Council, the community and other stakeholders where appropriate. <u>As part of the masterplanning process site promoters and developers should also, where appropriate, explore the possibility of long-term stewardship of assets with the local community.</u>	Comment: in order for this amendment to be effective, the previous clause ix needs to be addressed. A community that has been ignored will not be prepared to take on long-term stewardship of assets.
MM69	n/a	208	1. All new development, including building conversions, refurbishments and extensions, should seek to minimise <u>the</u> carbon and energy impacts <u>of their design and construction. Proposals must demonstrate that they are seeking to limit greenhouse emissions through location, building orientation, design, landscape and planting</u> in line with <u>taking into account any</u> nationally adopted standards <u>and in accordance with Policies DES11: Carbon Reduction and DES8: Efficient use of Resources.</u>	Support Comment: This clause should also include associated infrastructure, including road infrastructure associated with the development.
Sustainability Appraisal Addendum	STRAT 7 – 3	263	Will the option/alternative improve accessibility for everyone to: • health, (access to GP's, dentist, hospitals)	Object: The site will provide a GP surgery, but it will result in the closure of the existing GP surgery and will move this facility out of reach of those in the existing village, resulting in a



				serious negative effect. There are no provisions for dentists or hospitals.
Sustainability Appraisal Addendum	STRAT 7 – 4	264	√site would ensure that new residential development is located in close proximity to more than one of a range of facilities for healthcare and wellbeing (e.g. within 800 m of a GP surgery and open space)	Object: The majority of the site will be beyond 800m of a GP surgery. The provision of a GP surgery, will result in the closure of the existing GP surgery and will move this facility well beyond 800m of those in the existing village, resulting in a serious negative effect.
Sustainability Appraisal Addendum	STRAT 7 – 6	265	√Site would reduce need for travel (e.g. new development is within 800m of one or more services) OR The policy/Site would encourage the use of sustainable travel/transport of people/goods	Object. There is no option for a bus service to Wallingford, or any of the other nearby Market Towns. The Oxford Bus Company has expressed concerns about the viability, and this concern has been amplified in their response to the Planning Application P20/S2134/O where it is made clear that the provisions in the plan are “barely credible” and “in the realms of fantasy”. This must be considered a negative as the site will significantly increase the need for travel as there will be insufficient services and employment, and no public transport, on the site.
Sustainability Appraisal Addendum	STRAT 7 – 7	266	x Site boundary is within 400m of a locally designated site	Comment: The Biodiversity Assessments show a net loss of 92.4%. There are no proposals to replace the loss of habitat with a like-for-like habitat.



Sustainability Appraisal Addendum	STRAT 7 – 8	266/267	The development of this site would result in the considerable redevelopment of a large amount of brownfield land (significant positive).	Object: The site is not brownfield. There are no services or utilities connections associated with brownfield sites. Further, the site is an active airfield, and as such should not be considered brownfield. The site is not in the SODC Brownfield register. The Council's own viability assessment values the land at greenfield BLVs.
Sustainability Appraisal Addendum	STRAT 7 – 10	268	√The potential for a positive effect against climatic factors is identified for all sites on the basis that there would be potential for greenhouse gas emissions associated with built development to be reduced and for renewable energy to be incorporated in new developments.	Object: There are no controls proposed on the emissions from the building works themselves, nor the road infrastructure. Emissions from cement are extremely high, and are not referenced.
Sustainability Appraisal Addendum	STRAT 7 – 13	268	STRAT7 requires provision of at least 5ha of employment land. Land will also be safeguarded to ensure Martin Barker can continue operations alongside the creation of a new runway	Object: The quanta of employment land identified is insufficient for a development of this scale. Conservative estimates show that fewer than half of adults of working age will be able to find work on the site. The safeguarded land is not a positive; the CAA have advised that the realigned runway would result in the loss of the licence for ejection seat testing, which is the main business of Martin-Baker.



Yours sincerely,

[Redacted signature]

Paul Boone

Chairman, Chalgrove Airfield Action Group

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