

OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO SOUTH OXFORDSHIRE LOCAL PLAN 2035 MAIN MODIFICATIONS

Comments close 2nd November 2020

Introduction

1. Oxfordshire County Council welcomes the progress being made on the South Oxfordshire Local Plan, which has now reached this Main Modifications consultation stage following hearings and receipt of the Inspector's preliminary conclusions letter. We have provided comments throughout the process of preparing the Local Plan and our comments below reflect the position reached from discussions to date.
2. We are happy that many of the matters which we raised have been addressed through the modifications. We largely support the modifications.
3. Our comments below are set out in respect of each of the Main Modifications. To highlight our objections where changes to text are sought, the changes are set out in this statement as strikethrough and underlined. If the text is already in the Main Modification, then it is not highlighted in this response. We consider that these changes are necessary to make the Plan sound.
4. It is our view that the changes sought in this response are matters that were covered in hearings, therefore do not necessitate further hearings, and can be agreed by the Inspector and included in his final report without the need for any further consultation. We would then welcome the adoption of this Local Plan.

MM2, MM3, MM4, MM7, MM69, MM70, MM71 (and others) – Climate Change

5. The County Council's February 2019 response raised a soundness issue in respect of climate change, sustainability and innovation, indicating that the Local Plan should include more text to ensure that development takes place in a manner which makes the best use of sustainable resources and is future-proofed. We attended the Matter 8 hearing and provided further advice on this. We are pleased that there is a comprehensive suite of modifications, summarised in the new Appendix 16 of the Local Plan, and that climate change is now positively addressed in the Local Plan.
6. As stated during the Matter 8 examination, the County Council considered that DES11 should give further priority to minimising energy demand for all new developments through a fabric first approach, thus reducing the additional renewable energy resource required to meet the remaining demand, in line with the energy hierarchy. This approach should be demonstrated by the Energy Statements required for the development. We welcome the addition of paragraphs 9.38, 9.39, 9.40 and 9.41 within the explanatory text relating to DES11. We strongly encourage the South Oxfordshire District Council's Design Guide to reflect this description, specifically requiring developers to minimise energy demand through a fabric first approach, in line with the energy hierarchy. An example of best practise is the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide, which has been endorsed by the Chartered Institution of Building Services Engineers (CIBSE).

MM5 – Policy STRAT2 – Housing Requirements

7. In our Matter 1 statement for the hearings, we confirmed that the County Council is content that the figure of 775 dwellings per annum for the period 2011-2035 (total 18,600) is sound, and for 4,950 dwellings to be additionally provided between 2021-2035 to address Oxford's unmet need (leading to a total requirement of 23,550 dwellings). The monitoring provision for Policy STRAT2 in Chapter 12 clearly sets out these requirements. Policy STRAT2 itself should be amended to make it clear that the Oxford unmet need requirement is being counted from 2021 by adding the words 'between 1 April 2021 and 31 March 2035' to the end of the second bullet point. The amendments to Table 5c indicate that the expected housing supply is 30,056; which is significantly more than the housing requirement.

MM6 – Policy STRAT3 – Didcot Garden Town

8. In our Matter 10 statement for the hearings, we requested some changes to the text of the new Policy STRAT3 on Didcot Garden Town. We generally support MM6 which addresses our requests and clearly sets out the policy for Didcot Garden Town.

MM8 – Policy STRAT5 – Residential Densities

9. We appreciate that MM8 improves the policy on density. We support the part of the modification that advises that higher densities should be achieved on sites well served by public transport or with good accessibility by foot or bicycle to town centres or a district centre within Oxford City. Indeed, we concur that appropriate densities and mixes of uses can support local facilities and transport networks.

MM10 – Policy STRAT7 – Chalgrove Airfield

10. The County Council provided a Matter 11 statement for the Chalgrove Airfield hearing, appending a few requested changes to the policy and text. We generally support MM10 which largely addresses our requests and clearly sets out the policy for development of the airfield.
11. We maintain our view that Policy STRAT7 2 ix should be amended as requested in our hearing statement. The provision 'd' should read: 'encourages cycling and walking and provides links through the site and to adjacent employment and into the village of Chalgrove and other destinations...'. The word 'local' has been included in the modification, perhaps accidentally as this is incorrect, as it will be necessary to provide for cycling in a manner that links with other strategic sites and more distant destinations such as Oxford.
12. There is a current outline application for the strategic development at Chalgrove Airfield (P20/S2134/O) and there is scoping for the environmental impact assessment for related off-site highways works at Stadhampton/Chiselhampton and Cuxham (P20/S3272/SCO). Many issues have been raised by objectors to the Chalgrove Airfield planning application.
13. Our hearing statements identified that the County Council has had reservations about this site allocation given its location away from existing towns and significant infrastructure, and there are many complex issues that need to be considered in responding to the planning application. We ask that the Inspector addresses in his final report the requirements for a sustainable development including new and improved transport connections, on-site facilities such as primary schools, and a secondary school to replace the constrained Icknield Community College.

MM11 – Policy STRAT8 – Culham Science Centre

14. We note the amended boundary of the Culham Science Centre allocation and Green Belt boundary as shown in Appendix B and Appendix C. We have no objection to that. We made no particular comments on Policy STRAT8 concerning Culham Science Centre, and the other parts of MM11 propose no changes that we need to comment on.

MM12 – Policy STRAT9 – Land Adjacent to Culham Science Centre

15. The County Council provided a Matter 12 Statement which requested some amendments to Policy STRAT9. We generally support MM12 which largely addresses our requests and clearly sets out the policy for development of the land adjacent to Culham Science Centre. As noted in our hearing statements, this is the largest proposed allocation and must provide a secondary school; is well located in respect of the planned HIF1 Didcot to Culham River Crossing and Clifton Hampden Bypass; and the site is very well located for accessing the rail network, with Culham Station being adjacent. We expect that allocating this site will support the business case for investment in the rail services, that funds will be provided in respect of the HIF1 schemes, and that there will be other improvements e.g. for sustainable transport modes such as a pedestrian/cycle bridge across the River Thames linking to Abingdon and Oxford. We ask that the Inspector highlights in his final report the requirements for a sustainable development which will include provision of new and improved transport connections, on site facilities such as primary schools, and a new secondary school.

MM13 and MM14 – Policy STRAT10 and STRAT10i – Land at Berinsfield

16. The County Council provided a Matter 15 statement which indicated broad agreement with the draft modifications proposed by the District Council and only some amendments. The modifications seek to recognise the garden village designation and set out the garden village principles as well as specific policy provisions aimed at regenerating the existing Berinsfield village. We support MM13 and MM14 (as published and amended by Erratum) which largely addresses our requests and clearly sets out the policy for development of the land at Berinsfield.
17. We have picked up an error in respect of the Local Green Space designation within Berinsfield village. The drawing in Appendix 2 shows an irregular boundary next to the leisure centre which should be regularised into a straight line. The small area of land that will be thus excluded is part of the leisure centre site that is subject to a joint use agreement between the County Council and the District Council. We consider that this is a minor modification matter and have forwarded the relevant plans to the District Council.
18. On the concept plan, all indicative route alignments have been deleted. We sought deletion of the indicative route alignment link to Burcot Lane but welcomed the indicative route alignment link to the A4074. It is now clear in the modification text Policy STRAT10i 2 vi a that a new junction and access onto the A4074 to the north of the existing A4075/A415 junction is expected, which will involve land outside of the allocation, therefore we are content that such indication is not needed on the concept plan.
19. Allocating land at Berinsfield has been envisaged since the Core Strategy was produced, and development here is intended to help regenerate the existing village. As indicated in our hearing statements, allocating land in this location also helps to make the new secondary school at Culham a viable size. We expect that contributions will be provided in respect of the HIF1 schemes, and that there will be other improvements e.g. for sustainable transport modes such as cycle routes linking to Culham and Oxford. We ask that the Inspector highlights in his final report the requirements for a sustainable development which will include

provision of new and improved transport connections, on site facilities such as primary schools, and contributions for the secondary school at Culham.

MM15 – Policy STRAT11 – Land South of Grenoble Road

20. The County Council provided a Matter 13 statement indicating that some changes to text and the concept plan were required in respect of this draft allocation.
21. We generally support MM15 which largely addresses our requests and clearly sets out the policy for development of the land south of Grenoble Road. We are broadly supportive of the policy provision which expects the site to be fully integrated and relate closely to the existing settlement of Blackbird Leys (and, by implication, Greater Leys) and to ensure the improvement of off-site walking and cycling infrastructure to connect with the surroundings. These provisions will be particularly important to ensure that Grenoble Road itself does not present an impediment to encouraging active travel and connectivity
22. Appendix A shows an amended concept plan. School locations are no longer shown, which we support, as we requested such was deleted. Indicative road links remain and are similar to those shown before – we noted in our matter statement that there are several existing roundabouts on Grenoble Road from which access into this site can be taken if appropriately upgraded, or there are other options for new junctions. We are broadly content with the indication that road access will be required directly from the A4074 to the safeguarded Park & Ride site and that this access would be used also for the development, although it would likely not be through the Park & Ride as implied in the concept diagram, instead it would need to be around the Park & Ride site. The matter of the most appropriate road alignments will need consideration through masterplanning, for example alignments will need to most effectively and efficiently provide for public transport services through the site.
23. As noted in our hearing statements, providing for this large allocation at Grenoble Road, supports the business case for investment in the railway, particularly the reopening of the Cowley Branch Line. A secondary school is expected on the site, along with on-site provision for primary schooling, both suitably located away from the sewerage treatment facility and high voltage electricity lines. We ask that the Inspector highlights in his final report the requirements for a sustainable development which will include provision of new and improved transport connections, and on site facilities such as a new secondary school.

MM16 – Policy STRAT12 – Northfield

24. The County Council provided a Matter 14 statement indicating that some changes to text and the concept plan were required in respect of this draft allocation.
25. We generally support MM16 which largely addresses our requests and clearly sets out the policy for development of Northfield. We consider that some further text is required, as set out in later in this response, regarding links with existing development at Blackbird Leys and support for regeneration.
26. Appendix A shows an amended concept plan. We requested deletion of the school location, the indicative access points and the indicative route alignment and support the modifications which delete these.
27. Like the Grenoble Road site, this allocation, as noted in our hearing statements, supports the business case for investment in the railway, and contributions will help to make the secondary school on Grenoble Road a viable size. We ask that the Inspector highlights in his final report the requirements for a sustainable development which will include provision for new and improved transport connections, on site facilities such as a primary school, and contributions for the secondary school on the Grenoble Road site.

MM17 – Policy STRAT13 – Land north of Bayswater Brook

28. The County Council provided a Matter 16 statement seeking that the separate non-strategic site at Sandhills be deleted from the draft allocation as it was not supported by the evidence available; and that the text and the concept plan be amended in respect of the land north of Bayswater Brook.

Sandhills/Bayswater Farm Field

29. We understand that the land at Sandhills is known locally as Bayswater Farm Field. It is south of Bayswater Brook, so it is not sensible to refer to it as being north of the brook. We consider that if it is to be allocated, the allocation should be renamed 'Land north of Bayswater Brook and Bayswater Farm Field'.
30. The text has not been written for, and is not sound in relation to, Bayswater Farm Field. In our view there has been insufficient consideration of the issues concerning Bayswater Farm Field. We have not changed our view that allocating Bayswater Farm Field is not sound given the lack of evidence. However, on the basis that the Inspector has indicated that his preliminary conclusion is to find this site sound, it is the focus of our comments at this point to seek amendments so that the allocation text identifies how the two sites are each addressed, given that they are separated by Bayswater Road and other land, owned separately, and will be promoted at different times by different developers. Having regard to the statement of common ground between the District Council and the owner of Bayswater Farm Field, signed 14th August 2020, we have prepared the amended text in Appendix 1.
31. We have considered the issue raised by many objectors about the Forest Hill to Shotover bridleway 215/8 which exists between the site and the Sandhills estate. Given that there is no existing access from the site across the bridleway and the unregistered land upon which it sits, it appears that vehicular access over the bridleway to Burdell Ave or Delbush Ave may not be possible and that instead the site must be accessed via the road network that connects via Waynflete Road and ultimately Bayswater Road. An access in that location, from a road that is not classed as a public highway, is shown in the developer's concept appended to the statement of common ground with the District Council so we assume that there is agreement with the owner of the private road. We have some reservations whether an acceptable access can be provided in this location due to geometric constraints and we have no traffic evidence to indicate what level of additional traffic will be acceptable on the road junctions. Nevertheless, we accept that the traffic impacts will depend on the scale of the development, which will need to be limited accordingly. As there is no separate figure accorded to this site in the drafting of the allocation, there can be no assumption that the amount of development will be as much as the 120-150 houses assumed in the developer's concept attached to their Statement of Common Ground with the District Council.

Land North of Bayswater Brook

32. The main site of the allocation (the Land North of Bayswater Brook) was part of the land identified in the post-SHMA work in 2016. It is well located to support regeneration in Barton and enable new housing close to the hospitals. We ask that the Inspector highlights in his final report the requirements for a sustainable development which will include provision for new and improved transport connections, on site facilities such as a primary school, and other contributions off-site.
33. In general, we are content that the modifications are appropriate to enable the County Council to address its functions in responding to any planning application for the land north of Bayswater Brook – in this case our primary interest is in relation to transport. The County Council did not make any particular comments on whether the draft allocation might be ruled out on the basis of landscape effects or effects on the

nearby SSSI as these are matters best dealt with at the district level. We note that the modifications have been informed by that hearing discussion and the evidence presented by the various parties.

34. One point that does need amending is that reference to the Infrastructure Delivery Plan should be retained, for clarity and consistency with all the other allocation policies. STRAT13 2 vi should therefore begin: 'Necessary facilities for movement, referring to the Infrastructure Delivery Plan'. Apart from this, the changes in Appendix 1 to this response relate to the Bayswater Farm Field site, and not the North of Bayswater Brook site.
35. Overall, we consider that the policy as amended by the Main Modification provides sufficiently to ensure that the County Council, as highway authority, is able to require appropriate provision of on-site and off-site transport infrastructure to mitigate the effects of development on the land north of Bayswater Brook. The County Council's position is not changed from that given in our Statement for the hearing. There being no other transport modelling available, the County Council is relying on the Evaluation of Transport Impacts, where one scenario was modelled with a major new link road between the Marston Interchange and a point east of the Thornhill Park & Ride; and another with a grade separation of Headington roundabout; as necessary mitigation of development on the allocated land. While it may be theoretically possible for some other combination of transport measures to address the traffic issues, the local plan text must provide for the possibility that either the modelled link road or the grade separation could be required, and that the developer will be expected to fund that. We consider that the text adequately does that i.e. STRAT13 2 vi says that new highway infrastructure will be required if needed, in accordance with the NPPF tests.
36. We agree with an emphasis on good active travel and sustainable travel connections. STRAT13 2 vi now specifically refers to a new pedestrian and cycle bridge across the A40 which will require a suitable landing point outside the allocated site. We consider that the text allows for discussion between parties as to the location of such a bridge so that it is as useful and convenient as possible for residents. We anticipate improvements to cycle routes outside of the site e.g. on Marsh Lane, and at the existing subway at Wick Close. Appropriate cycle and pedestrian provision will also need to be made along Bayswater Road.
37. Achieving suitable bus services will not be easy, but we consider that there is enough in the policy to ensure that the developer pump primes the necessary services and provides for the necessary works. The supporting text modification to 4.115 particularly refers to improvements to the Headington Roundabout and its approaches to include bus priority measures. The developer has proposed a measure on the A40 eastbound approach to Headington Roundabout which we consider will be necessary. Further work is anticipated about bus routes and how buses will access the site.
38. The main vehicle access point will need to be from a remodelled Marston Interchange, outside of the site allocation. The policy indicates that this additional land will be needed, and we understand that the developer has control of the necessary land. The access onto Bayswater Road is anticipated to be from the site, and the precise location and mitigation works will need to be considered upon a planning application.

Concept Plan

39. We support the modified concept plan which indicates that additional land is needed for transport access around the Marston Interchange and have no other comments on the concept plan. There is no need for a separate concept plan for the Bayswater Farm Field, so the only further change to that suggested in Appendix 1 would be to change the title of the indicative concept plan to 'Land north of Bayswater Brook and Bayswater Farm Field'.

MM18 – Policy STRAT14 – Wheatley Campus

40. The Inspector did not hold a hearing about the draft allocation at Wheatley Campus, so no statements were produced. The draft allocation benefits from outline planning permission, secured at appeal mid-2020.
41. The policy for the site, which is subject to this MM18, is different to the other site policies and deletes the concept plan. The amended policy is largely consistent with the outline permission. However we consider that the following amendments are necessary for soundness so that it is clear what agreements have been reached in the event that the permission lapses: STRAT14 2 iv a should read: ‘improvements to cycling and walking provision, particularly to the centre of Wheatley and the primary school’; STRAT14 2 iv b should read: ‘well-connected bus services with access points through the site west and east and contribution to public transport provision.’

Consistency in respect of Infrastructure Delivery Plan

42. The Infrastructure Delivery Plan is a document that can be updated at any time and indeed should be updated regularly. As such it is not appropriate for a policy to require infrastructure as set out in the Infrastructure Delivery Plan. Instead, we sought that all the site allocation policies advise that the Infrastructure Delivery Plan should be referred to. This is of interest to the County Council in respect of transport infrastructure. The main modifications partly change the standard text as follows: ‘all necessary transport infrastructure ~~as set out~~ referring to in the Infrastructure Delivery Plan, which is likely to include’. We support those modifications (for Chalgrove Airfield and Northfield). In a few cases a further amendment is required for consistency. That is: Land Adjacent to Culham MM12 Policy STRAT9 3 vii; Land at Berinsfield Policy STRAT10i MM14 2 vi; Land South of Grenoble Road MM15 Policy STRAT11 2 ix; Land North of Bayswater Brook MM17 Policy STRAT13 2 vi; and Land at Wheatley Campus Policy STRAT14 2 iv.

Consistency in respect of Masterplanning with Oxfordshire County Council

43. A comprehensive masterplan is required in respect of most of the strategic site allocations, a policy provision that we support. In all cases it is mentioned that the masterplan should be prepared in conjunction with the local planning authority. MM17 in respect of Bayswater Brook states that ‘The masterplan must be prepared in collaboration with the Local Planning Authority, Oxford City Council and Oxfordshire County Council.’ Because Oxfordshire County Council will of course be involved in such masterplanning for all sites, reference to the County Council should be included for soundness in the other policies where a similar reference is made. Therefore, MM15 in respect of Grenoble Road should be amended (STRAT11 3) and MM16 in respect of Northfield should be amended (STRAT12 3) using the same text as MM17 i.e. ‘The masterplan must be prepared in collaboration with the Local Planning Authority, Oxford City Council and Oxfordshire County Council’. It may also be necessary to change the text about masterplanning for the other allocation sites to include Oxfordshire County Council in the same manner.

Consistency in respect of Regeneration

44. The regeneration of the existing Berinsfield village, Blackbird Leys, and Barton are reasons supporting the allocation of land at Berinsfield (STRAT10), Grenoble Road (STRAT11), Northfield (STRAT12) and Bayswater Brook (STRAT13). This was discussed at the Examination hearings. We consider that, as a matter of soundness, there should be consistent requirements to support regeneration, even though the Blackbird Leys and Barton areas are situated in Oxford City rather than South Oxfordshire District.

45. We support MM13 as it relates to Berinsfield in that it sets out the regeneration package expected. In contrast, MM15 for Grenoble Road, MM16 for Northfield and MM17 for Bayswater Brook are not sufficiently clear.
46. Paragraph 4.98 of the supporting text for Grenoble Road Policy STRAT11 is already the subject of MM15. The following highlights additional text we consider necessary in addition to the changes already proposed, so that the paragraph as a whole reads as follows:
- 4.98: 'The site is also adjacent to Blackbird Leys, one of the most deprived areas of Oxfordshire. Part of the justification for releasing this site from the Green Belt is that it can support the regeneration of this area through providing new housing stock, community facilities, employment and training opportunities and excellent sustainable transport links. The development will make a valuable contribution towards meeting Oxford City Council's regeneration objectives for the Blackbird Leys area through the provision of new housing alongside employment and education facilities; together with the creation of good linkages and funding arrangements for facilities which are used by residents in both areas.'
47. Policy STRAT11 v already requires 'a high-quality development that is fully integrated and relates closely to the existing settlement of Blackbird Leys'.
48. Policy STRAT11 vi is subject to MM15. A further amendment to that is needed so that it reads: 'improvements to existing community facilities and services at Blackbird Leys necessary to address impacts arising from the increased usage by the residents of land south of Grenoble Road and development of new facilities either on the Grenoble Road site or in the Blackbird Leys area suitable for future joint use.'
49. Paragraph 4.103 of the supporting text for Northfield Policy STRAT12 is already the subject of MM16. The following highlights additional text we consider necessary in addition to the changes already proposed, so that the paragraph as a whole reads as follows:
- 4.103 'An urban extension on the southern edge of Oxford will promote a sustainable form of development that will in part, assist the city in addressing its housing commitments of the Oxfordshire Growth Deal. Northfield is well located for access to employment and services within walking and cycling ranges and the B480 is an existing public transport corridor. There are opportunities to provide improved transport links. The site lies close to the Blackbird Leys area, one of the most deprived areas of Oxfordshire. The development will make a valuable contribution towards meeting Oxford City Council's regeneration objectives for the Blackbird Leys area through the provision of new housing and education facilities; and the provision of good linkages and funding of facilities which are used by residents in both areas.'
50. The Northfield Policy STRAT12 is the subject of MM16 but there are no requirements about supporting regeneration at Blackbird Leys. There should be policy which is consistent with that at Grenoble Road such as:
- 'a high-quality development that is fully integrated and relates closely to the existing settlement of Blackbird Leys'.
- 'improvements to existing community facilities and services in the Blackbird Leys area necessary to address impacts arising from the increased usage by the residents of Northfield and development of new facilities either on Northfield or at Blackbird Leys suitable for future joint use.'
51. Paragraph 4.116 in respect of the Land North of Bayswater Brook identifies the adjoining area of Barton. It states: 'The English Indices of Deprivation 2015 identified the adjoining area of Barton as being within the 20% most deprived areas in England. Barton is identified as a priority regeneration area in the Oxford City Local Plan. Development at Land North of Bayswater Brook has potential to support regeneration aspirations for Barton by increasing the viability of and contributing to the improvement of existing services and facilities and by providing new accessible services and facilities.' This text is not followed up

with any specific text in Policy STRAT13, and to be sound and consistent with the other policies, we believe it should. The policy should therefore include the following:

‘a high-quality development that is fully integrated and relates closely to Barton (including Barton Park)’.

‘improvements to existing community facilities and services at Barton necessary to address impacts arising from the increased usage by the residents of Land North of Bayswater Brook and development of new facilities either on the Land North of Bayswater Brook or in Barton suitable for future joint use.’

MM24 – Policy H2 – Didcot

52. The housing numbers at Didcot are clarified by this MM24. Instead of the previous ‘around 6,500’ number, the number is now identified as being 6,399. One site is deleted from the calculations (Didcot A) while one site is added (Land South of A4130). Of the 8 allocations in Didcot, 5 are carried over from previous plans and 3 are new: Didcot Gateway (for 300 homes); Land South of A4130 (for 166 homes) and Hadden Hill (for 74 homes). The 4 sites which do not currently have even an outline permission are: Ladygrove East, Vauxhall Barracks, Orchard Centre Phase II remaining site, and Didcot Gateway.
53. A new part to the policy has been added in respect of Ladygrove East. This site is currently subject to the planning applications P19/S0720/O and P20/S2361/O. This is the only one of the 8 allocations to have a special provision in the policy. We have no objection to the content of the addition, which is about green spaces, although we have a concern given the lack of other policy provisions both for the Ladygrove East site and the other allocations. The added text does not appear to ‘sit’ well within Policy H2 and we previously made no comments on Policy H2 as it was not apparent that it would have any policy provisions concerning any of the sites.

MM27 and MM30 – Policy H9 and H13 – In relation to specialist housing

54. Under the Care Act 2014, the County Council has a statutory duty to provide care and support for people with eligible needs. We comment on local plans in respect of provision for care homes and extra care housing, having regard to the current service provision and anticipated future needs, most recently set out in a Market Position Statement in 2019, and Extra Care Housing supplement.
55. We support MM27 which amends Policy H9 in respect of the requirement for 40% affordable housing, increasing to 50% for the sites adjacent to Oxford City. The provision for the sites adjacent to Oxford City as drafted is not as clear as that for the other sites as it does not mention C2 and C3 and the whole provision would benefit from further minor drafting improvements for clarity. We will work with District Councils so that some of the affordable housing requirement for some schemes is provided in the form of new affordable Extra Care Housing.
56. The Policy H13 modifications follow the Inspector’s queries raised in IC2 and the Matter 3 hearing for which the County Council provided a Matter statement. The modifications encourage the delivery of specialist housing for older people in locations with good access to public transport and local facilities. Local communities are also encouraged to identify suitable sites in neighbourhood plans, and provision should be made within the strategic housing developments. We support the modifications.

MM46 – Policy EMP10 – Community Employment Plans

57. The Inspector did not hold a hearing about the policy on community employment plans and the modification to delete the policy reflects the Inspector’s response in IC06 to IC02A as follows: ‘In IC2, I

made clear that this policy is unsound. The equivalent policy in the Oxford Local Plan was found unsound. Replacing the word “require” with “encourage” does not alter the point. The Council’s attention is drawn to paragraphs 97 to 101 of the Oxford Local Plan report. The issues are the same. Like Oxford, South Oxfordshire is not an island and businesses operate in a competitive local, national and international business environment. The policy and supporting text must be deleted and this deletion must be included within the draft schedule of main modifications. There will be no further discussion on this. The Council could introduce some new background text which encourages applicants to submit a skills plan along with major development proposals, but this should not be seen as a requirement and should cover only skills development, not local procurement and local employment.’

58. As invited by the Inspector, there should be some background text in the local plan to encourage developers to work with providers of skills. It is disappointing that the District Council did not take the opportunity as invited earlier, but such text could be included in the Inspector’s report or could be a minor modification and would read as follows at the end of the introductory paragraph 6.4 about Employment and Economy. ‘The Council will also expect developers of strategic sites in this Local Plan to work with local businesses and providers to develop skills plans relating to both the construction and operation of their sites so that opportunities for local employment, apprenticeships and training are considered.’

MM49 – Policy INF1 – Developer Funding for Infrastructure

59. We support the text added to Policy INF1. This text makes it clear to developers that developer contributions will be sought, in accordance with the relevant regulations, even where forward funding from government has been secured. Such text was requested in our Matter 7 statement.

MM50 and MM51 – Policy TRANS1a and TRANS1b – Strategic Transport

60. We support MM50 in that Policy TRANS1a will no longer refer to an Oxford-Cambridge Expressway, instead supporting strategic transport investment across the Oxford-Cambridge Arc. In Policy TRANS1a(ii) some further text is needed to make it clear that this policy is about a range of transport schemes, for example upgrades to strategic routes such as the A34. The text should read: ‘plan for and understand impacts and required mitigation associated with any other major proposed transport measures across the Oxford to Cambridge Arc’. Supporting text at paragraph 7.13 is also corrected as a minor modification (MN35), which is also important as the text was previously incorrect. The out-of-date diagram is deleted as a minor modification (MN36) and we support that.
61. We support MM51 which amends policy TRANS1b to refer to all the HIF transport schemes and the Cowley Branch Line.

Minor Modification (MN55) TRANS3 - Road Safeguarding

62. We appreciate that there are minor modifications to the road safeguarding maps in Appendix 5, included as requested by the County Council (MN55).

MM62 – Policy EP5 – Minerals Safeguarding Areas

63. Policy EP5 has been amended in response to the Inspector’s questions in IC2. The County Council is the Minerals & Waste Planning Authority. We are content with MM62. The policy will read: ‘1. Minerals are a non-renewable resource, therefore, to safeguard future potential extraction, development will be

directed away from Minerals Safeguarding Areas. 2. Where development in Minerals Safeguarding Areas cannot be avoided, developers are encouraged to extract minerals prior to non-mineral development taking place, where this is practical and environmentally feasible.'

MM63 and MM66 – Policy DES1 and Policy DES4 – Development and Masterplans

64. We support MM63 and MM66 which make a number of changes to the policies about delivering high quality development and masterplanning.
65. MM63 includes some provisions about transport into Policy DES1 – that is viii, xi and xix about the hierarchy of routes, access to services, and car and bicycle parking. We support those provisions.
66. MM66 includes new provisions about masterplanning – that is vi about principles of natural surveillance and active street frontages and ix about the involvement of other stakeholders in the preparation of masterplans. We support those provisions.

Appendix 1

Oxfordshire County Council's Response

South Oxfordshire Local Plan 2035 Main Modifications

Further to Paragraph 30 of Response

(Changes shown as strikethrough and underlined)

Land north of Bayswater Brook and Bayswater Farm Field

4.107

Land north of Bayswater Brook and Bayswater Farm Field directly adjoins ~~the eastern boundary edges~~ of Oxford City. The sites were previously located entirely within the Oxford Green Belt, however the Council took into account the government's policy in the NPPF relating to the Green Belt, and concluded that exceptional circumstances existed to inset ~~this~~ these sites from the Green Belt. The exceptional circumstances for doing this are:

- The site's proximity to major employment locations and a wide range of services and facilities means that there is high potential to support travel by walking and cycling;
- The main strategic site is well positioned to connect with public transport provision in Oxford City; and
- The development of ~~this~~ these sites will help to provide for Oxford City's unmet housing need, including affordable housing need, close to where that need arises.

Land north of Bayswater Brook

Paragraphs 4.108 to 4.118

Bayswater Farm Field

New paragraphs as follow:

This site is located to the north of Sandhills and south of Bayswater Brook. As Bayswater Brook is designated as a Site of Local Importance to Nature Conservation in the Oxford City Local Plan, existing habitats associated with the brook should be protected and opportunities for enhancement should be pursued. Development is therefore expected to be set back from the brook.

Between the site and the Sandhills development is a bridleway which runs from Barton to Forest Hill. There is no current access from the site across the bridleway. Oxfordshire County Council as highway authority cannot grant or permit vehicular access across the bridleway without evidence of title or private access rights. Without such evidence, only pedestrian and cycle access into the Sandhills roads (Delbush Avenue and Burdell Avenue) is expected.

To be developed, vehicle access is likely to be required from Bayswater Farm Road, which is largely a private road. The road will need to be upgraded to serve the new housing.

The closest bus stops to this site are at Waynfleete Road, Thornhill Park & Ride and the A40. Development is expected only on the parts of the site closest to the bus stops.

Policy STRAT13: Land North of Bayswater Brook and Bayswater Farm Field

Site area: 112ha hectares

1. Land within the strategic allocation at Land North of Bayswater Brook and Bayswater Farm Field will be developed to deliver approximately 1,100 new homes and supporting services and facilities within the plan period.

Land North of Bayswater Brook

Clauses 2 and 3

Bayswater Farm Field

New clauses:

Proposals to develop Bayswater Farm Field will be expected to deliver:

- i) affordable housing provision and mix in accordance with Policy H9;
- ii) contributions to primary, secondary and Special Educational Needs (SEN) off-site;
- iii) necessary facilities for movement which should provide high quality pedestrian and cycle links through adjacent developments to maximise the number of trips made by non-car modes. Vehicle access is expected to connect to Bayswater Farm Road. Any planning application will be expected to be accompanied by a Transport Assessment and Travel Plan and measures to mitigate any significant residual impacts on the highway network will be required;
- iv) a net gain in biodiversity through the protection and enhancement of habitats along the Bayswater Brook;
- v) a network of green infrastructure that retains and incorporates areas of functional flood plain and existing surface water flow paths, connects with adjoining green infrastructure within Oxford City, improves and extends public rights of way where appropriate and supports movement through the site and into adjoining areas by walking and cycling

Land North of Bayswater Brook and Bayswater Farm Field

Clauses 4 (archaeology), 5 (phasing) and 6 (biodiversity) to apply to both sites.

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="Mrs"/>	<input type="text"/>
Full Name	<input type="text" value="Susan Halliwell"/>	<input type="text"/>
Organisation (if relevant)	<input type="text" value="Oxfordshire County Council"/>	<input type="text"/>
Job Title (if relevant)	<input type="text" value="Director of Planning and Place"/>	<input type="text"/>
Address Line 1	<input type="text" value="New Road"/>	<input type="text"/>
Address Line 2	<input type="text" value="Oxford"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text" value="Oxfordshire"/>	<input type="text"/>
Postcode	<input type="text" value="OX1 1ND"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text" value="PlanninginOxfordshire@oxfordshire.gov.uk"/>	<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

Several – see attached

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.

(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:

The County Council largely supports the Main Modifications to the Local Plan. However, we have some comments on the Main Modifications and consider that some amendments are needed for soundness. The matters have been addressed at hearings and the Inspector can require the amendments in his report without the need for further consultation. We would then welcome adoption of this Local Plan.

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)