

[REDACTED]

From: Martin J. Harris [REDACTED]
Sent: 23 October 2020 10:07
To: Planning Policy South
Subject: Response from Martin Harris to consultation on the Main Modifications to the South Oxfordshire Local Plan SOLP 2035

To South Oxfordshire District Council, Planning Policy Team

Response to consultation on the Main Modifications to the South Oxfordshire Plan 2035

(This is sent to SODC Planning Policy by e-mail as text because the SODC consultation response form is incompatible with my own version MS Word)

From Mr. M. J. Harris
[REDACTED]

Ref. MM8 referring to Policy STRAT 5: Residential Densities (page 41), I recommend adding the words shown below in **bold red and underlined** into this list of bullet points under paragraph 2 to indicate that the Green Belt is regarded as a constraint in this Local Plan to reflect the guidance on this set out in the NPPF:

'2.The density of a development should be informed by:

- the capacity of the site and the need to use land efficiently in accordance with Policy DES8: Efficient use of resources;
- the need to achieve high quality design that respects local character;
- 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; **and the need to enhance the functions of the Green Belt as set out in the NPPF.**
- 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
- the need to minimise detrimental impacts on the amenity of future and/or adjoining occupiers.'

Ref MM16 Policy STRAT 12 Northfield (page 67) in paragraph 3:

I recommend adding the words shown here in **bold red and underlined** to this paragraph. The Duty to Co-operate between LPAs is well understood, especially in cross-boundary developments, but the Northfield site is proposed to be entirely within South Oxfordshire, so SODC is the controlling LPA, and the addition of the words "in consultation with" clarifies SODC's need to consult and co-operate with Oxford City Council rather than to imply that Oxford City Council might have an over-riding veto over a masterplan approved by SODC:

'3.The proposed development at Northfield will deliver a scheme in accordance with an agreed comprehensive masterplan taking into consideration the indicative concept plan. The masterplan must be prepared in collaboration and agreed with the Local Planning Authority and **in consultation with** Oxford City Council. The proposals will be expected to deliver a masterplan that demonstrates:...'

and in paragraph 3(vi) (page 68):

I recommend the addition of the words "**and permanent boundary between this development site and the Green Belt**" because the addition of this phrase more accurately represents both the EiP Planning Inspector's and the

developer's understanding, as specifically expressed in the oral hearing of the virtual EiP of SOLP 2035, of the need for a permanent boundary to this development site with the Green Belt, marked by geographical features in this sensitive location:

'3 (vi) Add new criterion: (vi) the delivery of higher density development (a minimum of 70 dph) along key transport corridors, adjacent to the local centre, and towards the north western boundary of the site to respond to the existing adjacent development, gradually reducing the scale and density of development to provide a transition across the site towards the eastern and south-eastern countryside edges where the lower density development should be delivered, alongside a network of green infrastructure to create an appropriate urban edge **and permanent boundary between this development site and the Green Belt**, to deliver an overall site-wide average net density of 50-70 dph.'

and in 4.103 (page65):

In common with any local resident, I am fully aware of the relative physical isolation of the Northfield site from Oxford City as the active part of the Cowley Branch Railway line separates the two areas except at the one bridging point where the B480 Watlington Road runs beneath this railway at a major traffic pinch point beside the BMW factory, and the requirement for improved transport connectivity between the Northfield site and the City of Oxford on the other side of this railway line must be made a priority Planning obligation for the sustainable development of the Northfield site, rather than, as in the original wording which points merely to an optional opportunity for improving connectivity. So the insertion of the words "**the required**" in bold red type are recommended:

'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 **the required** improved transport links.'

Ref. Appendix A – Amendments to the Concept Plans

The Amended Concept Plan (as it will appear in the Plan following adoption for STRAT 12 is labelled as 'Indicative Concept Plan Northfield', and while it may be a slightly more accurate indication of the general concept of the developer's ideas for an eventual masterplan, the breadth of the 'Green Infrastructure' along the south east boundary of the site facing towards the village of Garsington does not seem to be sufficiently wide at approximately 70 metres (as depicted in the Amended Concept Plan) along the Watlington Road B380 to represent the "200 metres width" of this green infrastructure which was described in the oral hearing session of the virtual EiP of SOLP 2-235 by the representative of the developers of this site as being part of the developer's plan to create a wide buffer zone of green infrastructure to clearly separate the development on the Northfield site from the village of Garsington. For the avoidance of any doubt about the eventual breadth of this belt of green infrastructure, I recommend that the depiction of this green infrastructure should be made more accurate and to scale in the 'amended Indicative Concept Plan Northfield' to represent at the scale of this plan a width of approximately 200 metres of green infrastructure. If this correction is made to the amended concept plan, it will serve as better guidance for those responsible for eventually developing a Planning Application for this site, and will serve to reduce the encroachment of actual buildings into the very narrow strip of open farmland in the Green Belt which separates Garsington from Cowley, which currently fulfils the purposes of designating this land as Green Belt, and additionally supports an important wildlife corridor identified for protection in the Oxfordshire Nature Recovery Plan.

END