

Emerging South Oxfordshire Local Plan Proposed Main Modifications Consultation

Part A - contact details

Q1. Are you responding as an:
Individual

Individual contact details

Q2. Due to statutory planning regulations, a name and means of contact is required for your representation to be considered:	
Title	Ms
Full name	Laura Rival King
Business / Organisation name (if relevant)	
Job title (if relevant)	
Address line 1	
Address line 2	
Address line 3	
Postal town	
Postcode	
Telephone number	
Email address	

Part B - your comments

Q5. 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 as amended by Erratum Schedule of Policies Map Changes Sustainability Appraisal Addendum Habitats Regulations Assessment Addendum If you wish to provide comments on more than one proposed main modification or document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:
Schedule of Proposed Main Modifications

Q6. Which Main Modification number or consultation document are you commenting on? 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 click here to view 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

MM3

Q7. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

Including a new paragraph in response to the Inspector's questions and to the concerns expressed during the Hearings on the issue of the climate change emergency is most welcome. However, this modification, like a number of other modifications (e.g. MM4, MM8, MM56, MM63, MM69) aimed at addressing concerns with the legislation linked to the Climate Law (and, more broadly, public, local, and expert concerns with the impact of accelerated climate change on modelling land use change) is extremely unsatisfactory.

The biggest problem with these modifications is that they recommend to either adopt 'good practice' or avoid 'bad practice,' without ever giving precise targets or imposing binding rules and standards. Co-opting concerns around the impact of accelerated climate change on land use change policy without clear targets and specific quotas will not do. We must ensure compliance with the highest standards, and not just recommend that they should be considered by developers.

This fundamental flaw in the proposed main modifications is compounded with the fact that every single mention of house requirement or development density is accompanied by quantified, mandatory targets. The contrast between addressing the climate change emergency in aspirational, quality terms and imposing a housing strategy through a quantified, mandatory, top-down policy is what makes this document a mockery of democratic values and planning principles.

Q8. If your comments are more than 500 words long, 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.

No Response

Q9. Please upload any supporting documents below:

No Response

Comment again, or finish?

Would you like to comment on another main modification or supporting document?

Yes, I'd like to make another comment

Part B - your comments

Q10. 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 as amended by Erratum Schedule of Policies Map Changes Sustainability Appraisal Addendum Habitats Regulations Assessment Addendum If you wish to provide comments on more than one proposed main modification or document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:

Schedule of Proposed Main Modifications

Q11. Which Main Modification number or consultation document are you commenting on? 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 click here to view 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

MM9 2, 5

Q12. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

This modification raises a number of issues regarding alterations to the Green Belt boundary. My objections relate to the fact that the proposed modifications do not adequately address concerns expressed during the Hearings and Post-Hearings, or matters and issues raised.

The vision expressed here for compensating losses of green space resulting from taking land out of the Green Belt in order to develop housing estates is utterly inadequate. Compensatory improvements must be clearly laid out in terms of landscape, biodiversity, and recreational needs, and quantified. In most of the areas where such housing developments are being proposed, there is a scarcity of land to accommodate all the identified biodiversity and recreational needs. Whereas 'nature' should come first as the best way to address the climate change emergency, the vision expressed here means that 'nature' will have once again to be sacrificed to short-term greed. Moreover, the recreational needs of the increased population are not properly taken into consideration. There are no clear, quantified targets for the provision of parks and green spaces. Moreover, compensatory improvements are left to the developers' judgement and ability. Providing green spaces for both biodiversity recovery and recreational purposes should be made mandatory according to clear quotas and binding rules.

Q13. If your comments are more than 500 words long, 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.

No Response

Q14. Please upload any supporting documents below:

No Response

Comment again, or finish?

Would you like to comment on another main modification or supporting document?

Yes, I'd like to make another comment

Part B - your comments

Q15. 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 as amended by Erratum Schedule of Policies Map Changes Sustainability Appraisal Addendum Habitats Regulations Assessment Addendum If you wish to provide comments on more than one proposed main modification or document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:

Schedule of Proposed Main Modifications

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MM17, 2(vi)

Q17. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

The paragraph removed contains more accurate information regarding the infrastructural challenges linked to the development of LnBB than the modified paragraph, especially on transport infrastructure issues. Worse, the grammatical structure of the new, modified paragraph is so incomprehensible that I am unsure as to the exact meaning of it. And I am not alone to have struggled with trying to understand the modified paragraph. The three Oxford-educated individuals who accepted to read it with me came to the same conclusion. This awkwardness is repeated in other documents linked to LnBB, such as, for instance, The Assessment Addendum of the HRA Main Modification prepared by LUC, which is available under Scheduled Policy Map Changes (see in particular paragraph 4.115, pages 32, 33, and 34). It is possible that this modification is not put in plain English simply because it tries to occult something that is evident and obvious to those who live in and around Barton. The site cannot be developed as intended and stated in SODC Local Plan. Developing LnBB would require major infrastructural investments, such as a new pedestrian and cycling bridge; a new highway; and possibly a new round-about. The cost would be prohibitive, and out of balance with the development's financial returns. The Oxford City Council has no funding to invest in such infrastructure, and it is highly unlikely that the housing developers would be prepared to meet the costs of developing a fit-for-purpose travel and transport plan either. A simple Cost and Benefit Analysis suffices to demonstrate that taking land out of the Green Belt without having a clear plan as to how this land will be developed to benefit the people of Oxford is a grave error. I have focused on LnBB not only because I am familiar with the case, but also because it is the most extreme example of what is wrong with the process through which the Growth Board has operated in its approach to reforming the Green belt in Oxfordshire.

Q18. If your comments are more than 500 words long, 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.

No Response

Q19. Please upload any supporting documents below:

No Response

Comment again, or finish?

Would you like to comment on another main modification or supporting document?

No, I'm ready to submit my comments now and finish the survey