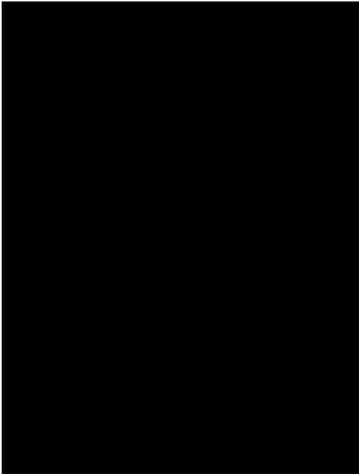


# Emerging South Oxfordshire Local Plan Proposed Main Modifications Consultation

## 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:	
<b>Title</b>	Mrs
<b>Full name</b>	Jaqi Mason
<b>Business / Organisation name (if relevant)</b>	
<b>Job title (if relevant)</b>	
<b>Address line 1</b>	
<b>Address line 2</b>	
<b>Address line 3</b>	
<b>Postal town</b>	
<b>Postcode</b>	
<b>Telephone number</b>	
<b>Email address</b>	

## 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

MM11

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.

We object to the proposed Main Modification MM11, and by association Map Mod 6 of the Strategic Policies map modifications, to alter and enlarge the inset area in STRAT 8 by including the 4 ha of "apron" land immediately south of the Culham Science Centre. Inclusion of the apron increases the proposed land inset from the Green Belt in STRAT 8 by more than 5%, a material increase, and which should be justified by exceptional circumstances for its removal from the Green Belt.

The apron was noted as an "outstanding matter" in the document SCG07 Statement of Common Ground between SODC and the UKAEA prior to the examination hearings. Inclusion (or not) of the apron was scheduled for discussion under Agenda Item 2 for Matter 12 at the hearings. However although Mr Bore stated his intention to discuss the apron immediately after the mid-morning break he did not return to the topic. We (in the form of Mrs J Mason) attended the Matter 12 hearing and, having noted the inspector had not returned to the topic after the break, contacted the programme officer Ian Kemp to indicate we wished to discuss the apron and asked Ian Kemp to notify the inspector. Despite this, the matter was not returned to during the remainder of the hearing on Matter 12. This is a failure of process at the examination.

Given the importance of the topic to ourselves and others attending the hearing, including the council who did not wish to include the apron in the inset area, and the lack of any discussion on the matter at the hearing, it is surprising the inspector has subsequently directed the council in his preliminary conclusions and post-hearings advice (email letter dated 28.08.20) to include the apron in the STRAT 8 inset boundary for the following reason:

" \* The boundary of the inset area at STRAT8 should be contiguous with the safeguarding line to make the best use of this land and ensure that the functioning of the site is not impaired."

The proposed safeguarding line had differed from the inset area of STRAT 8 for built development for the simple reason that some of the apron land is required for highways development. However Highways are exempt from the planning restrictions for removing Green Belt land if the land is required for new roads; inclusion of the safeguarded boundary in the plan is necessary to inform landowners, residents etc that the safeguarded land may be required for new infrastructure. It does not default that land safeguarded for new infrastructure must also be inset with adjacent land for built development so the development area is not impaired. Were this the case then logically land adjacent to the safeguarded areas around STRAT 9 could also have been inset on the same grounds.

It also cannot be said that the apron is required for the functioning of the site, since it will almost certainly become separated from the site by the proposed alignment of the new bypass as shown in the public consultation by OCC highways, April 2020 (see OCC's 13\_Scheme D\_Clifton Hampden Bypass attached to this response). A new entrance to the Culham Science Centre has been designed to the west of the site that no longer requires the entrance to cross the apron.

The inspectors reason to change the STRAT 8 inset boundary to include the apron is therefore insufficiently explained, particularly when there was no discussion of the matter at the hearings, has not been justified by exceptional circumstances for its removal from the Green Belt, and does not appear logical in light of the infrastructure proposals.

However, we have other reasons to object to the proposed modification. [REDACTED] a Grade II listed building which lies immediately south of the apron. The apron was formerly part of the farmland belonging to the farmhouse dating as far back as the Enclosure period, and which was only relinquished when construction of the former airfield began in WWII. The apron consequently unequivocally forms part of the setting to the listed farmhouse.

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We attach with this submission a comprehensive report on the Setting of Fullamoor Farmhouse carried out in 2018 by Keevill Heritage which shows in Figures 9, 10 and 12 the relationship of the apron land to the farmhouse over the centuries. This report has been accepted by Historic England and is held alongside the buildings listing registration by Historic England. We also attach a photograph of a map (Map 1909) recently sent us by former owners of the farmhouse showing the relationship between the farmhouse and this land in 1909.

Keevill Heritage acknowledge in Section 4 of their report "Views, setting analysis and vulnerabilities" that any development of the Culham Science Centre, its apron, and housing at STRAT 9 would require a setting assessment for the farmhouse. This relationship between the listed building and its setting however has regrettably not been considered in any of the discussions between the council, UKAEA and the inspector, other than in generalities about preserving listed buildings. The specific relationship of this building To STRAT 8 and STRAT 9 has simply been ignored following it's listing in late 2017.

The NPPF attaches great weight to the settings of listed buildings, making it clear the setting should be preserved and enhanced where possible. The apron forms essential rural green space between the farmhouse and the heavily developed land of the Culham Science Centre site and thus merits preserving, not developing. No substantive argument has been put forward for inseting the land for development that would outweigh the harm to this heritage asset by reason of alteration to it's setting.

Furthermore in the Statement of Common Ground SCG07 (paragraph 4.1 first bullet), it is argued by the UKAEA "this land [the apron] will not be open and undeveloped going forward; having regard to the five purposes of the Green Belt, nor is it necessary that this land is kept permanently open".

This statement is inaccurate for the following reasons:

The proposed location of the new Clifton Hampden bypass is to the front of the built area of the Science Centre and on the northern edge of the apron. Consequently the bulk of the apron land will lie south of this new primary route once it is constructed. The former A415 which presently passes south of the apron will be truncated and redesigned as an access road to Fullamoor Farmhouse. Consequently, if the Local Plan is implemented with the new highways links as designed, the apron land will "read" as part of the land associated with the farmhouse, not with the Science Centre, ie the proposed road developments serve to enhance the apron's link with the farmhouse not the science centre, and therefore it is essential it remains open and primarily undeveloped (see OCC consultation attachment).

The apron also meets the first test of including land in the Green Belt, which is to check the unrestricted sprawl of built-up areas. The re-location of the primary east-west road (the Clifton Hampden bypass) to the north side of the apron means the apron will lie south of the primary route, ie on the undeveloped side of the main road. This undeveloped side of the primary route runs southward to the River Thames (the southernmost boundary of the Green Belt). If the apron were included in the inset land this would clearly detract from the undeveloped Green Belt south of the primary route and Science Centre, and exacerbate the urban sprawl from STRAT 8 and STRAT 9 which was designed to be contained north of the primary route. Green Belt boundaries should be clearly defined - this would not be the case if land south of the primary route was then developed.

The apron land also meets the third test of the purpose of including land in the Green Belt which is to assist in safeguarding the countryside from encroachment. Fullamoor Farmhouse is a significant rural building, being much larger than farmhouses of similar age, and maintains clear and strong links to the surrounding countryside, all wholly within the Green Belt, a relationship that has been established since before the Enclosure period. We agree with the Council's reasoning that the apron provides a visual enclosure to the Culham Science Centre site limiting the views of the existing built form, and that this is particularly true of the relationship of the apron with the farmhouse.

Finally we would like you to note that under paragraph 4.1 of the "Outstanding Matters" in SCG07, second bullet point, the UKAEA acknowledges "unacceptable visual impact" is a relevant matter to the setting of heritage assets. Given this admission, we suggest the UKAEA has contradicted its own statements by seeking inclusion of the apron in the inset land for development, since any development of the apron will have a clear visual impact on the setting of Fullamoor Farmhouse.

In conclusion, the inset of an additional 4ha of Green Belt put forward in MM11 (and Map Mod 6) has not

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been justified by exceptional circumstances for removal from the Green Belt; and the additional land identified - the apron - is adjacent to and integral to the setting of Grade II listed Fullamoor Farmhouse, and no justification has been provided that outweighs the harm to the building's setting from the inset of the apron for development.

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.

Alteration of STRAT 8 boundary to include the "apron" south of the Culham Science Centre is not justified by exceptional circumstances for removal from the Green Belt; Furthermore the apron is an integral part of the setting of Grade II Fullamoor Farmhouse and no justification has been put forward to justify the harm to the listed building caused by inseting the apron for development..

Objection to the inclusion of the apron into the inset area for development because it has a material affect on the setting of Grade II listed Fullamoor Farmhouse.

Q9. Please upload any supporting documents below:

- File: 13\_\_Scheme\_D\_\_Clifton\_Hampden\_Bypass.pdf
- File: Fullamoor-Farm-Setting-Report.pdf – ATTACHMENT REMOVED DUE TO GDPR REASONS
- File: Map 1909.jpeg

**Scheme D: Clifton Hampden Bypass**

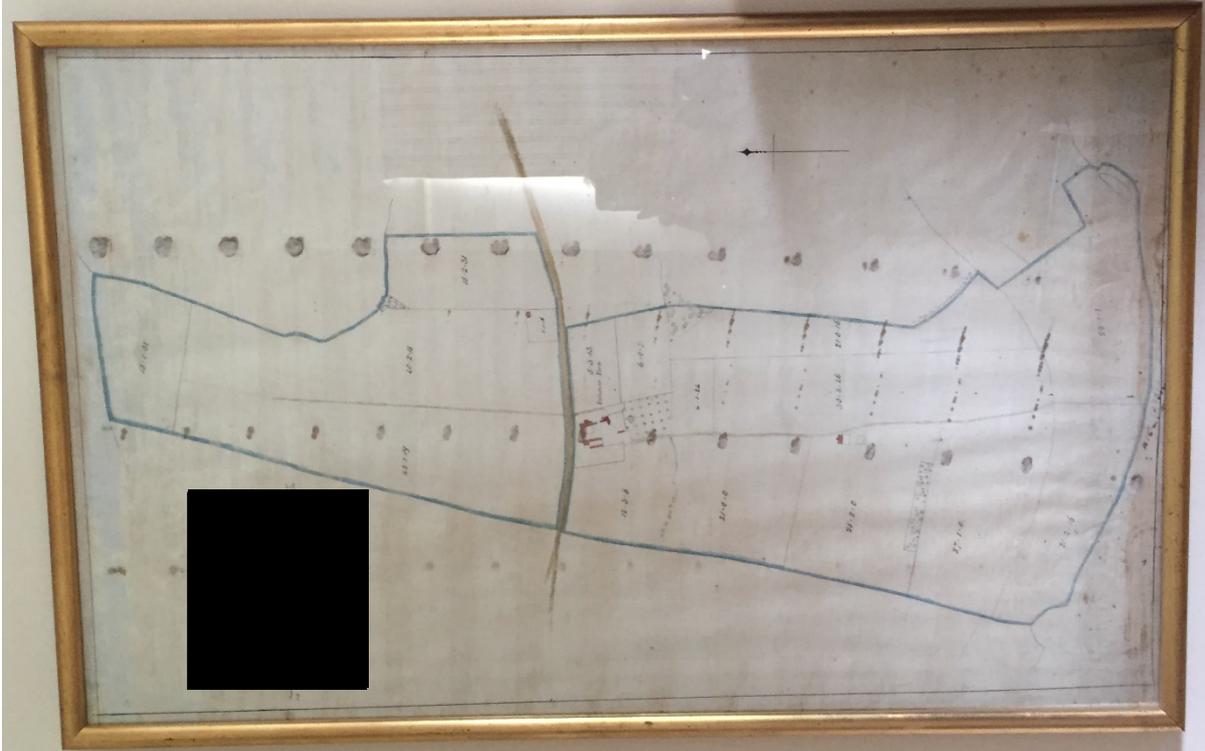


Indicative plan of Clifton Hampden Bypass



Artist's impression

### Attachment 3



### 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 Policies Map Changes

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

Map mod 6

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.

Please see our comments regarding MM11 which sets out our reasons that the modification to the inset area, as shown on Map Mod 6, is not justified.

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:

Sustainability Appraisal Addendum

Q16. 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

MM11

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 comments under MM11 are incorrect for p51 which suggests the amended area for STRAT 8 was discussed at the hearings as the reason for the amendment. The amended area was not discussed at the hearings, despite being on the agenda. This omission is referred to in our response to MM11 under the Schedule of Proposed Main Modificaitons

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