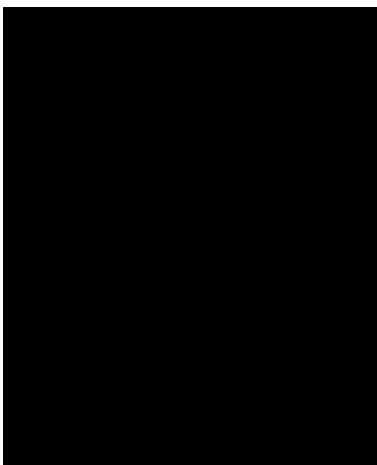


Emerging South Oxfordshire Local Plan Proposed Main Modifications Consultation

Part A - contact details

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|-------------------------------|
| 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 | Mrs |
| Full name | Katharine Rushton |
| 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

MM11 and MM12

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.

No Response

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.

My comments are summarised in the attached Excel document.

Q9. Please upload any supporting documents below:

- File: Main Modifications Comments KR.xlsx

Attachment 1

| Comments on Main Modifications to SODC local plan - Katharine Rushton October 2020 | | | | | |
|--|--|-----------------------|------------|--|--|
| MM | Para/Section | Public Version pg no. | MM pg no. | Schedule of Proposed Main Modifications September 2020 | Comment |
| Climate change and Sustainability | | | | | |
| MM3 4-9 | The Strategy 4.9 | p27 | p2 | "Contribute to tackling climate change" | The addition of this short sentence is too brief and vague as a main strategy at the start of the Publication version of the local plan. |
| MM7 | Str4 Strategic Development 5 (ix) | p40 | p13 | "A statement of how it is intended to achieve low carbon emissions and facilitate renewable energy generation" | When will this statement be issued, by whom, and how strongly will it be enforced? This statement is necessary now. |
| MM71 | DES11: Carbon reduction | n/a | p162 | "Development proposals (must)...achieve at least a 40% reduction in carbon emissions (now)... will increase from 310326 to at least a 50% reduction, and again from 310330 to 100% | The target of 100% reduction in carbon emissions should be set at the outset of all building works. Otherwise, the many houses built before 2030 will all fail the 2030 carbon zero test, and will need retrofitting.... |
| MM71 | DES11: Carbon reduction 9.39 | p211 | p164 | "The council also recognise that zero carbon homes are achievable for many residential developments now. The Council would encourage...zero carbon homes asap to avoid the need for costly retrofitting.;" | ...since the council recognises that zero carbon homes are possible now they should INSIST on this immediately all over South Oxfordshire. It should be a firm requirement starting in this year 2020. |
| MM11 MM12 | Str8: Culham Sc Cntr Str9: Lnd adj to CSC | p52 P53 | p28 P31 | "5. Proposals will be expected to deliver low carbon development and renewable energy in accordance with Strat 4" | The statement about how to achieve low carbon emissions and facilitate renewable energy generation in Strat4 - see above - has yet to be issued. All development at Culham should be agreed at 100% carbon zero before any building begins, especially as it is situated beside what is meant to be a world-leading science centre. |
| Green Belt and Biodiversity | | | | | |
| MM9 | Str6: Green Belt 5 4.59 | P44 | P21 | "The policy requires compensatory measures to be delivered to remediate for the removal of land from the GB...required by the NPPF at para 132." | The NPPF para 138 provides no more detail about compensatory measures for lost GB than this paragraph in the MMs. No type of compensatory measures are given, with no mention of required scales, proportions, or checks. |
| MM12 | Str9: Land adj to CSC 4 (x) | p54 | p33 | "a net gain in biodiversity...new woodland habitats...enhancements of the floodplain habitats...new wetland habitats*." | This description of 'biodiversity net gains' in Culham pertains only to the undevelopable land (floodplain) to the north of this site. The land where building would take place (majority of site) is currently home to hundreds of species of wildlife including deer, hares, foxes, bats, peregrine falcons, barn, tawny and little owls, skylarks, yellowhammers, linnets, corn buntings. This biodiversity cannot be offset by any offsetting scheme. |
| Minerals Safeguarding Areas | | | | | |
| MM62 | EP5: Minerals Safegding Areas 2 | p194 | p145 | "Developers are encouraged to extract minerals prior to non-mineral development taking place." | The quarrying of gravel has been refused at the proposed Hills quarry in Clifton Hampden, also on the A415. This new MM would allow extensive quarrying at Culham before houses were built. |
| MM12 | Strat9: Land adj to CSC | P55 | P34 | "6. Proposals will need to take account of EP5: Minerals safeguarding areas" | The original SODC local plan states: "4 vi) a layout that takes into account the mineral safeguarding area to the north of the (Culham) site". No other reference is made to the size, whereabouts, and potential time frame of the mining of this area. This information is essential, so that locals are aware of potential extra daily heavy trucks and pollution. Might it be that the 'new wetland habitats' * are created after 5-10 years of quarrying? |

| | | | | | <i>Housing numbers</i> |
|------|----------------------------------|-----|------|---|---|
| MM12 | Strat9: Land adj to CSC: 1 | p52 | p29 | 'Land will be developed to deliver approx 3,500 new homes, with approx 2,100 homes within the plan period'. | There are two 'approximates' in this sentence - this is too vague. How many houses will be built exactly at Culham - more or less than these numbers? Local residents should also know exactly where building will start - east, south or west? Specific details are necessary. |
| | | | | | <i>Infrastructure</i> |
| MM6 | Strat3: Didcot Garden Town, 1 iv | p39 | p5 | 'Focus on enhancing rail services to Didcot' | This needs a much stronger resolve - housing at Culham cannot happen without a confirmed, regular, reliable train link to Oxford and Didcot |
| MM6 | Strat3: Didcot Garden Town, 3. | P39 | P7 | 'Infrastructure will need to be in place to enable sites...to be delivered' | This should mean rail as well as road infrastructure should be in place by the time any building work starts |
| MM12 | Strat9: Land adj to CSC, 3vii | p53 | p30 | 'all necessary transport infrastructure...significant contributions towards the Clifton Hampden Bypass, the Didcot-Culham River Crossing, and upgrading the A4074/B4015 at the Golden Balls' | No mention is made here of the Culham railway (which is surely also essential transport infrastructure?), and no contribution is included to fund rail improvements. Also what happens to all the traffic after it leaves the Golden Balls roundabout? The roads around Nuneham Courtenay cannot deal with so much new traffic. |
| MM12 | Strat9: Land adj to CSC, 3vii | p53 | p30 | 'provision of a new cycle bridge and associated connectivity and paths across the River Thames to connect with Abingdon...to the north of the site' | The exact location of this cycle bridge at Culham is not marked on the Appendix A map on page 177 of the MMs. Formerly the map showed a red cycle arrow to the side of the Culham-Radley railway bridge. |
| MM12 | Strat9: Land adj to CSC, 4 | p54 | P31 | 'a plan which recognises improvements to Culham railway station...' | This is extremely vague. |
| | | | | | <i>APPENDIX A - Map: Amendments to the Concept Plans - Comments</i> |
| | Strat9: Land adj to CSC | | p175 | No cycle path is marked now on the new map to the north of the Culham site - is it certain to take place? Thame Lane appears to be sealed off at the Europa school by Green Belt reinforcement - will current Thame Lane residents be consulted on this? No schools are marked on the new Culham map, whereas three were marked on the earlier map: 1. Where will they now be situated? 2. When will they be built? 3. Has the Head of the Europa Primary (480 pupils) and Secondary (500 pupils) been consulted thoroughly on this? 4. Can the local roads cope with extra school traffic bringing Berinsfield children to the new Secondary - roads already hopelessly clogged at rush-hour? A green link follows the route of the power line on the east of the Culham site, but the route of the east-west power line north of Thame Lane is not shown. Houses are currently shown as lying under this power line. No mineral safeguarding area is marked on any Culham map. Where is it? The green infrastructure has been removed on the new Culham map, which had surrounded the existing two houses (Warren Cottage and Warren Farm House) in the middle of the site on the former map. How will these houses now be integrated into the site? When will they be consulted? Dense housing now spreads across the tracks into Culham No. 1 site, forming the new Local Centre. This new housing will impact heavily on all the existing houses situated around Culham Station. When will residents be consulted? It seems Culham No. 1 site will lose most of its employment units - have all these businesses been consulted? | |
| MM12 | Strat9: Land adj to CSC 4x | p54 | p33 | No new 'woodland habitats along the river escarpment' are marked on the new map. Where are they? | |

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