

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.

2. Agent Details (if applicable)

1. Personal Details

Title		Councillor
Full Name		Mr Leigh RAWLINS
Organisation (if relevant)		District Cllr SODC, Parish Cllr Sonning Common
Job Title (if relevant)		Councillor
Address Line 1		[Redacted]
Address Line 2		
Address Line 3		
Postal Town		
Postcode		
Telephone Number		
Email Address		

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

Please see succeeding pages, with a summary list and then responses for selected Main Modifications and maps.

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 Note :

PART B the summary list of Main Modification and Map comments, PLUS succeeding comments on individual modifications, one-per-page is all provided in a separately attached document.

Leigh Rawlins

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.

Re SUMMARY

Please see summary list and details in the separate document and its pages.

Thank you for your comments.

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Proposed Amendments to Local Plan 2035 - Main Modifications

(note "C.C." below = Climate Change)

Master SUMMARY of RESPONSES noting every Main modification.

Main Mod REF No. (* + erratum)	Area/Policy ref.	Subject	Comment?
MM1	All	Change 2034 to 2035 throughout	No - agreed
MM2	Vision & Objectives	Objective 8.2 re Energy and travel C.C.	Yes - mon
MM3	Strategy	New bullet on tackling C.C.	Yes - mon
MM4	STRAT 1	Spatial strategy to reduce need to travel and reduce carbon emissions re C.C.	Yes - mon
MM5	STRAT 2	Housing and employment requirements	Yes
MM6	STRAT 3	Didcot Garden Town	No - good
MM7	STRAT 4	Strategic development and C.C.	No - agreed
MM8	STRAT 5	Residential Densities	Yes - mon
MM9 (*)	STRAT 6	Green Belt	Yes
MM10 (*)	STRAT 7	Land at Chalgrove Airfield	Yes
MM11	STRAT 8	Culham Science Centre	No
MM12	STRAT 9	Culham housing site (vast) adjacent to CSC	Yes
MM13 (*)	STRAT10	Berinsfield site	Yes
MM14 (*)	STRAT10i	Berinsfield as a Garden Village	Yes
MM15 (*)	STRAT11	Grenoble Road site adjacent to Oxford	Yes
MM16	STRAT12	Northfield site adjacent to Oxford	Yes
MM17	STRAT13	Bayswater Brook site adjacent to Oxford	Yes
MM18	STRAT14	Wheatley campus site (of OBU) at Holton	Yes
MM19	HEN1	Strategy for Henley-on-Thames	No
MM20	TH1	Strategy for Thame	No
MM21	WAL1	Strategy for Wallingford	No
MM22	New Homes	Sources of Housing Supply	Yes
MM23 (*)	H1	New housing – Delivery – distribution and types	Yes
MM24	H2	New housing - Didcot	No
MM25 (*)	H3	New housing – Henley, Thame & Wallingford	No
MM26	H4	New housing – Larger Villages	Yes
MM27 (*)	H9	New housing – Affordable homes	No
MM28 (*)	H10	New housing – Exception sites	No
MM29	H11	New housing – Mix and overall housing stock	Yes
MM30	H13	Specialist accommodation for Older People	No
MM31	H14	Provision for Gypsies, Travellers, Showpeople	No
MM32	H15	Safeguarding existing sites for G/T/S people	No
MM33	H16	Infill development	No
MM34	H17	Sub-division for Houses in Multiple Occupancy	No
MM35	H18	Replacement Dwellings	Yes
MM36	H19	Re-use of rural (farm etc) buildings	Yes
MM37	H21	Extensions to Dwellings	Yes
MM38	EMP1	Employment land - new	Yes
MM39	EMP3	Employment land - retention	No
MM40	EMP4	Employment land - Didcot	No
MM41	EMP5	Employment land - Henley	No
MM42	EMP6	Employment land - Thame	No
MM43	EMP7	Employment land - Wallingford	No

MM44	EMP8	Employment land – Crowmarsh Gifford	No
MM45	EMP9	Employment land - Chalgrove	Yes
MM46	EMP10	Community Employment Plans	Yes
MM47	EMP11	Employment development in rural areas	No
MM48	EMP14	Retention of visitor accommodation	No
MM49	INF1	Infrastructure Provision	No
MM50	TRANS 1a	Strategic transport- re the “Ox-Cam Arc”	Yes
MM51	TRANS 1b	Strategic transport - other	No
MM52	ENV1	Landscape & Countryside	No
MM53	p 170; 8.10	Trees and Hedgerows in the Countryside	No - agreed
MM54	ENV3	Biodiversity (note need to amend title!)	No - title
MM55	ENV4	Watercourses	No - agreed
MM56	ENV5	Green Infrastructure	No - agreed
MM57	ENV6	Historic Infrastructure	No - agreed
MM58	ENV7	Listed Buildings	No - agreed
MM59	ENV8	Conservation Areas	No - agreed
MM60 (*)	ENV10	Historic Battlefields, Registered parks/landscapes	No - agreed
MM61	EP1	Air Quality	No - agreed
MM62	EP5	Minerals	No - agreed
MM63 (*)	DES1	Design - for high quality development	No - agreed
MM64	DES2	Design – enhancing local character	No - agreed
MM65	DES3	Design & Access Statements	No
MM66	DES4	Masterplans for Major Development	Yes
MM67	DES7	Public art	No
MM68	DES8	Efficient use of resources	Yes
MM69	DES9	Design – for sustainability	Yes - mon
MM70 (*)	DES10	Renewable Energy	No - agreed
MM71	DES11	Carbon Reduction	Yes - mon
MM72	Town centre	Town Centres – opening narrative	No
MM73	TC1	Retail and Services growth	No
MM74	TC2	Retail (centre) hierarchy	Yes
MM75	TC3	Comparison goods floorspace	No
MM76	TC5	Primary Shopping Areas	No
MM77	CF1	Safeguarding Community Facilities	Yes
MM78	CF5	Open Space, Sport & Recreation – in new dev	No
App A Maps	STRAT7	Chalgrove concept	Yes
App A Maps	STRAT13	Bayswater Brook concept	Yes
App B Maps	Culham SC	Culham CSC allocation map	No
App C Maps	Culham	Culham Green Belt inset	Yes

NOTE:

As requested, in the following pages each Main Mod that is commented upon is on a separate page.

Thanks.

CIlr Leigh RAWLINS

MM2	Vision & Objectives	Objective 8.2 re Energy and travel C.C.	Yes - mon
<p>Suggest amend “an increase in renewable energy use” to “<i>an increase in renewable energy generation</i>”.</p> <p>Also, add text.</p> <p>“The Monitoring Framework will include criteria for reporting on these Objectives through the Annual Monitoring Report, on both a site and plan-wide basis.”</p> <p>Seeks to ensure that all Objectives are reported on through the Monitoring Framework on an annual basis in the Annual Monitoring Report.</p> <p>Also note: The objective to reduce the “need to travel” starkly conflicts with the isolated Chalgrove site.</p>			

MM3	Strategy	New bullet on tackling C.C.	Yes - mon
<p>Add text:</p> <p><i>“The Monitoring Framework will include criteria for reporting on these Objectives through the Annual Monitoring Report, on both a site and plan-wide basis.”</i></p> <p>Seeks to ensure that all Objectives are reported on through the Monitoring Framework on an annual basis in the Annual Monitoring Report.</p>			

MM4	STRAT 1	Spatial strategy to reduce need to travel and reduce carbon emissions re C.C.	Yes - mon
<p>Add text:</p> <p><i>“The Monitoring Framework will include criteria for reporting on these Objectives through the Annual Monitoring Report, on both a site and plan-wide basis.”</i></p> <p>Seeks to ensure that all Objectives are reported on through the Monitoring Framework on an annual basis in the Annual Monitoring Report.</p> <p>Also note: The strategy to reduce “the need to travel” starkly conflicts with the isolated Chalgrove site.</p>			

MM5	STRAT 2	Housing and employment requirements	Yes
<p>Comments:</p> <p>The period to 2035 is agreed.</p> <p>The housing requirement states 18,600 for South Oxon to 2035 and 4,950 for Oxford unmet need to 2035, a total of 23,550 or 23.6k.</p> <p>These requirements have :-</p> <ul style="list-style-type: none"> • Been based on out of date 2014 SHMA forecasts using c. 2012 data • Ignored up-to-date household numbers and projections • Ignored stark and clear evidence of the impact of Covid 19 that will, even over a long period have substantial impacts on the economy, investment, jobs and housing demand (incl migrational demand). <p>They are thus overstated. At the very least, this knowledge should inform a review of the necessary supply and headroom. Allowing headroom of 10% would imply a need for a housing supply of 26.0k – not the current 30.1k with its understatement of windfalls and strategic capacities.</p> <p>The Oxford unmet need (4,950) should <u>not</u> be ring-fenced against the Grenoble, Northfield and Bayswater Brook sites. These sites are suggested to provide an (<u>understated</u>) supply of 5,380 homes by 2035. There is scope to reduce Green Belt take and if for instance Bayswater – the most sensitive site - were removed it would cost 1,100 homes. In practise Culham (2,100 homes to 2035) and Berinsfield (1,700 homes to 2035) can contribute to Oxford need and indeed the housing at Culham <u>far</u> exceeds the expected growth of job capacity of the C.S.C.</p> <p>Support the principle of the stepped trajectory, but suggest <u>less</u> in the early period – again acknowledging both past reality <u>and</u> Covid.</p> <p>Employment land growth requirement may thus be overstated – based on the above factors – but nonetheless it has merit in a district with too much commuting and too much out-commuting.</p>			

MM8	STRAT 5	Residential Densities	Yes - mon
<p>Strongly support the improvements and particularly respecting “local character” and “minimise detrimental impacts on the amenity” of adjoining occupiers.</p> <p>However there appears to have been some back-sliding since the earlier iterations at the time of the EiP and an attempt to re-introduce 45 net d.p.h. as some kind of default minimum. (See 3)</p> <p>For clarification, suggest additional wording :-</p> <p><i>“Sites in villages and areas with less urban character are likely to need much lower surrounding densities to respond to local character, low-rise development and adjoining density. Sharp and incongruous changes in character will not be appropriate.”</i></p> <p>Much of the new wording seems loaded towards high rather than appropriate density.</p> <p>4.55 wrongly asserts that 45 net dph can be achieved if with an ambiguous “built form” that is consistent. It should rather that development should fit in with local character and have ambitions for density constrained accordingly. There seems to be an attempt to revert to more of the submission approach? Arguably 4.55 is simply not necessary?</p> <p>4.56 makes much more sense!</p>			

MM9 (*)	STRAT 6	Green Belt	Yes
<p>The requirement is for housing of 23.6k, which plus a reasonable headroom of 10% gives a housing supply need of 26.0k. In that context the housing supply of 30.1k is excessive. There is some 4.1k of excess supply.</p> <p>The housing supply includes strategic sites with an acknowledged extra future (post 2035) supply of 2.8k and a further latent supply from those sites well in excess of 7k. The housing supply also substantially underplays the likely supply of windfalls.</p> <p>On the above basis how can it properly be said that “great weight” has been applied against use of Green Belt land? The Green Belt land-take can and should be reduced. As noted above in respect of MM5, even the Oxford unmet housing need does not justify the gross take. In fact, given latent supply it is likely that 2 of the 3 Oxford edge sites could meet that need in full, but even if that were not quite so it could also be met from other sites such as Culham and Berinsfield. The Green Belt land-take can and should be reduced.</p> <p>The evidence shows that the Bayswater Brook and the northern area of the Culham residential site are particularly sensitive. In say the latter case, even if included in the allocation site (keeping it within a red line site area) it is not actually necessary or desirable for such an area which is not intended for built development to be inset?</p> <p>However, in the case where sites go forward, what is agreed is the need for compensatory improvements for the Green Belt inset and taken.</p>			

MM10 (*)	STRAT 7	Land at Chalgrove Airfield	Yes
<p>It is wrongful to characterise this site a PDL when it is a largely grassed area which is sometimes used for the grazing of sheep!</p> <p>The evidence has shown that this site is:-</p> <ul style="list-style-type: none"> • Not needed to meet the housing requirements • Isolated and unsustainable without jobs commensurate with this large development within a reasonable distance. This violates the aim of reducing the “need to travel” referenced at MM2 and MM4 and is likely to simply add to car-based congestion in Oxford. It does not fit in with respecting climate change. • The evidence identified significant risks to safety given the continuing Martin Baker operations on the site and there was no definitive proof that the safety risks were resolved. On the prudential principle and in the aftermath of Grenfell we surely cannot roll the dice on such questions? Sustainable development must be safe. • The evidence showed that the promoter of the site could not demonstrate that the site is developable and available within a sensible period or indeed such that the site would be delivered in the plan period at all. The test of reasonable positive expectation required by the NPPF and Local Plan regulations has not been met. The concern may be that if the beneficiary were any other party than the UK Government then then this site would have been rejected? <p>The proposed allocation should be removed from the Local Plan.</p> <p>In the event that the allocation is retained, it should be explicit that it will lapse if resolution of the tenancy and safety issues have not been definitively resolved within 5 years of adoption then the allocation should lapse and become void. No application should be determined before these matters are resolved.</p>			

MM12	STRAT 9	Culham housing site (vast) adjacent to CSC	Yes
<p>It is clear that the housing levels proposed for this site far exceed the jobs expected to be created at CSC. Therefore this allocation implies jobs being commuted to in Abingdon, Oxford or (perhaps) London. Much has been made of its rail connection and eventual scope for better rail connections. In that case it can count towards the provision of unmet need for Oxford?</p> <p>What is clear is that the CSC does not in any sense justify per se housing development on this Green Belt site. But again there are UK Government interests.</p> <p>Even as put forward and in particular noting new 4 (x), the sensitive area to the north of this site should not be inset from the Green Belt and made prey for development in conflict with this Local Plan.</p> <p>Add provision that <i>“The electricity lines now on pylons will be undergrounded through the site”.</i></p> <p>There is a good case for a new secondary school to be at Berinsfield rather than Culham.</p> <p>Noting MM11 and the para 1 page 51 modification, the Culham residential and village/town site should take due account of visual impacts on the River Thames and the wider countryside – including the Wittenham Clumps. So the design and masterplan should ensure that aim.</p>			

MM13 (*)	STRAT10	Berinsfield site	Yes
MM14 (*)	STRAT10i	Berinsfield as a Garden Village	Yes
<p>Generally support the changes including</p> <ul style="list-style-type: none"> • Enduring stewardship and legacy and • Tenure blind housing <p>However there is a good case for there to be a secondary school on this site as part of the Garden Village.</p>			

MM15 (*)	STRAT11	Grenoble Road site adjacent to Oxford	Yes
<p>Add provision that <i>"The electricity lines now on pylons will be undergrounded through the site".</i></p> <p>Add provision that <i>"A landscaped urban edge can be created to the south of the site to provide a transition into the wider landscape through structured woodland planting including community woodland."</i></p>			

MM16	STRAT12	Northfield site adjacent to Oxford	Yes
<p>Add provision that :-</p> <p><i>“The incorporation of a belt of community-stewardship woodland to provide the southern edge, will help avoid coalescence with and visual impact on the adjoining settlements of Blenheim & Garsington and provide a defensible edge into the wider Green Belt landscape.”</i></p>			

MM17	STRAT13	Bayswater Brook site adjacent to Oxford	Yes
<p>This site is highly sensitive and was almost universally expected to be rejected at examination. This site and its modest benefit of 1,100 homes from a large area of sensitive land to be inset from the Green Belt is simply not needed - as explained at MM5 and MM9 above. The sensitivity of the site is emphasised by its two adjacent SSSIs.</p> <p>This site has unresolved hydrology challenges that have not been adequately assessed or addressed. The modifications do not do enough on hydrology and there is nothing about masterplanning to focus on this issue.</p> <p>In part it was also objected to by Oxfordshire County Council. It is unnecessary and should be withdrawn.</p> <p>However if it were to proceed regardless then there is indeed a need for a pedestrian and cycling bridge of the A40.</p> <p>The Secretary of State's direction does not dictate in favour of unsustainable development. This site should be withdrawn, but failing that then the Masterplan for the site must take account of known and identified flood risks after proper analysis and survey.</p>			

MM18	STRAT14	Wheatley campus site (of OBU) at Holton	Yes
<p>The appeal inspector and the Secretary of State (on call-in) ruled that the “south-western quadrant” of this site was not part of the campus curtilage, was not PDL and should not be developed and should remain as undeveloped Green Belt land.</p> <p>The currently proposed modification not only proposes to inset that quadrant from the Green Belt but explicitly to enable it for development – flying in the face of the above decision. Why?</p>			

MM22	New Homes	Sources of Housing Supply	Yes
<p>The statement of housing supply (from erratum) details a supply of 30,056 or 301k by 2035.</p>			
<p>The requirement is for housing of 23.6k which, plus a reasonable headroom of 10% gives a housing supply need of 26.0k. In that context the housing supply of 30.1k is excessive. There is some 4.1k of excess supply.</p>			
<p>The housing supply includes strategic sites with an acknowledged extra future (post 2035) supply of 2.8k and a further latent supply from those sites well in excess of 7k. The housing supply also substantially underplays the likely supply of windfalls. Thus the overall supply could be more like 41k, albeit with some after 2035 (subject to build-out speeds).</p>			
<p>In this context the overall supply and land take is grossly excessive. That great amount is NOT required for the bloated and out-of-date 2014 SHMA, nor for unmet Oxford City need nor for the Oxfordshire Growth Deal. It is simply unjustified.</p>			
<p>It therefore follows that there is <u>not</u> evidence that due “great weight” has been given to avoiding inset and use of Green Belt land nor to the major flaws of judicial review weight that attach to the Chalgrove site. There is scope to reduce excess supply from the strategic sites, to reduce the carbon footprint of development and give more recognition of the environment.</p>			
<p>The following supplies by 2035, for example, should be noted :-</p>			
<ul style="list-style-type: none"> • Bayswater Brook 1.1k homes • Chalgrove Airfield <u>2.1k homes</u> • JOINTLY <u>3.2k homes</u> 			
<p>Jointly they are well within the excess headroom of 4.1k.</p>			
<p>There should be more balance, more recognition of the flaws and harms applying respect for both local democracy and appropriate criteria. Accordingly some removals from the allocations of strategic sites are appropriate.</p>			

MM23 (*)	H1	New housing – Delivery – distribution and types	Yes
<p>Comment :</p> <p>There is a concern as to interpretation of policy point 4.</p> <p>We should not see development on land outside the built up areas because of some ancient claim that the land was once occupied in history. MM35 H18 clarifies that replacement dwellings are not to be expected on abandoned sites. There are for example a number of long-abandoned sites in woods etc in the district etc were used as temporary camps for huts with brick chimneys in WW2. They are now largely returned to their natural state in the countryside. The references to PDL, or derelict land in 4 must not be a vehicle for unintended consequences?</p> <p>As noted above table 5c states the housing supply as 30,056 or 30.1k.</p> <p>The requirement is for housing of 23.6k which, plus a reasonable headroom of 10% gives a housing supply need of 26.0k. In that context the housing supply of 30.1k is excessive. There is some 4.1k of excess supply.</p> <p>The housing supply includes strategic sites with an acknowledged extra future (post 2035) supply of 2.8k and a further latent supply from those sites well in excess of 7k – as demonstrated in matter 2. The housing supply also substantially underplays the likely supply of windfalls. Thus the overall supply could be more like 41k, albeit with some after 2035 (subject to build-out speeds).</p> <p>Delivery is excessive and is not to meet any local need – even as unduly inflated in the requirements. In this context the overall supply and land take is grossly excessive. That great amount is NOT required for the bloated and out-of-date 2014 SHMA, nor for unmet Oxford City need nor for the Oxfordshire Growth Deal. It is simply unjustified.</p> <p>Since there are clear adverse impacts then such excess supply, beyond reasonable headroom, is not sound.</p> <p>Suggested amendment – Add new text:</p> <p><i>“This will include the implementation of walkable routes into and through the development”.</i></p>			

MM26	H4	New housing – Larger Villages	Yes
<p>Paragraph 5.30 of the plan recognises that there may be AONB constraints to development such that 15% growth cannot be achieved. However policy H4 suggests that speculative development outside those allocated or outside the built limits <u>will</u> be supported if the full 15% growth cannot be achieved!</p> <p>It is agreed that local communities must bring forward a Neighbourhood Plan in a reasonable time-frame, but not that “those requirements” as framed in paragraph 1 should be sacrosanct. The words “to meet those requirements” should be struck out from paragraph 2. Paragraph 72 of the NPPF should be respected.</p> <p>The requirements in paragraph 1 have been reduced by both allocations and achieved infills and windfalls in the relevant settlement as at March 2020. For the avoidance of doubt it should be clear that ongoing infills and windfalls in the relevant settlement will also count towards delivery of the requirements. This point is underlined by the fact that the suggested district supply of windfalls (at table 5c of 1,200) is very much understated.</p>			

MM29	H11	New housing – Mix and overall housing stock	Yes
<p>Please re-instate the original point 4 at page 103 and 5.60 at page 105 to provide for 3% of market housing to design in wheelchair accessibility. Failure to provide for disabled needs is wrongful, does not take due account of longevity and I would argue is unlawful by failing to recognise the needs of people who will be needing such accessibility. How can we provide for the highly unsound flights of the 2014 SHMA projections whilst ignoring sound projections for longevity and disability?</p> <p>As regards para 5.51 page 104 and housing evidence, please add in words to the effect of :-</p> <p><i>“In planning for the mix of new housing needed, full account should be taken of past delivery since March 2011 and of the effects of current and past patterns of extensions and permitted development on the overall housing stock. This is important to balance the overall stock to meet local needs.”</i></p>			

MM35	H18	Replacement Dwellings	Yes
Agreed – but note “abandoned” in relation to MM23 !			

MM36	H19	Re-use of rural (farm etc) buildings	Yes
Rural buildings should primarily fulfill their agricultural and employment role as part of a sequential approach.			

MM37	H21	Extensions to Dwellings	Yes
<p>The “inter-mediation” role of the planning system as between neighbours and residents generally is an important one in all sorts of ways to manage potential conflicts of interests and aid social cohesion.</p> <p>So, suggest that wording such as “<i>does not conflict with the reasonable amenity of neighbours</i>” should be added as a bullet point.</p>			

MM38	EMP1	Employment land - new	Yes
<p>Whilst it could be argued that the forecasts were excessive and that Covid will curtail them, there is a need to reduce commuting generally and the high out-commuting of the South Oxon. District and thus there is a good case to provide more employment land closer to where people live, particularly with the modern broadband network.</p>			

MM45	EMP9	Employment land - Chalgrove	Yes
This allocation is fine, but it is not remotely enough in the context of the huge amount of additional (and unnecessary) housing proposed on an isolated, unsafe and unavailable residential site.			

MM46	EMP10	Community Employment Plans	Yes
The root and branch eradication of this policy goes far beyond the scope of the 'concerns' raised and is unreasonable.			

MM50	TRANS 1a	Strategic transport- re the "Ox-Cam Arc"	Yes
<p>The title should change from "Expressway".</p> <p>Add <i>"but will not support an unnecessary and unhelpful car-based and HGV based Expressway or equivalent through South Oxfordshire."</i></p>			

MM66	DES4	Masterplans for Major Development	Yes
<p>Suggested amendment to the Explanatory Text (re Local Plan Para 9.16, Page 203) – Add additional text to the line reading. <i>“As part of the masterplanning process site promoters and developers should also, where appropriate, explore the possibility of long-term stewardship of assets with the local community.”</i></p> <p>Insert additional text for line to read ‘ <i>“As part of the masterplanning process site promoters and developers should also, where appropriate, explore the possibility of long-term stewardship of assets with the local community for example through community woodland or community land trusts in appropriate locations.”</i></p> <p>Includes key points made during Examination hearings, as options to consider through the Masterplanning process.</p>			

MM68	DES8	Efficient use of resources	Yes
Suggest add wording at the end “, <i>subject to local context.</i> ”			

MM69	DES9	Design – for sustainability	Yes
<p>Suggested amendment – Add new text:</p> <p><i>“Annual progress will be reported through the monitoring framework set out in chapter 12 and the Annual Monitoring Report on progress on delivering carbon reduction and emissions and climate change adaption by key sites & the District as a whole”.</i></p> <p>Seeks to ensure that the key new policy is properly reported on through the Monitoring Framework on an annual basis in the Annual Monitoring Report in the same way that other key policies will be.</p>			

MM71	DES11	Carbon Reduction	Yes
<p><i>“Annual progress will be reported through the monitoring framework set out in chapter 12 and the Annual Monitoring Report on progress on delivering carbon reduction and emissions and climate change adaption by key sites & the District as a whole”.</i></p> <p>Seeks to ensure that the key new policy is properly reported on through the Monitoring Framework on an annual basis in the Annual Monitoring Report in the same way that other key policies will be.</p>			

MM74	TC2	Retail (centre) hierarchy	Yes
<p>Subject to the changes in the Use Classes, for the benefit of sustainability, centre uses must be focussed on the retail, service (incl health, dentistry and click-n-collect), commercial and employment uses that sustain settlements – especially as regards ground floor uses.</p>			

MM77	CF1	Safeguarding Community Facilities	Yes
Query bold wording and unclear meaning re page 222 “ another shop <u>in</u> 1,000m2 ”?			
Ditto page 241.			

App A Maps	STRAT7	Chalgrove concept	Yes
This housing site is unneeded, inappropriate and unsustainable, it should be withdrawn.			

App A Maps	STRAT13	Bayswater Brook concept	Yes
This site is unneeded, too sensitive and is thus unsustainable as well as having unclear viability. It should be withdrawn.			

App C Maps	Culham	Culham Green Belt inset	Yes
The Green Belt inset for the residential site should be amended to leave the northern-most area that is not intended for development in the Green Belt .			

ENDS