

[REDACTED]

From: Peter [REDACTED]
Sent: 02 November 2020 21:51
To: Planning Policy South
Subject: Response to Consultation on Main Modifications
Attachments: Consultation on Main Modifications.docx

Please find attached my comments arising on the Consultation on the Main Modifications

Peter Dragonetti
District Councillor for Goring Heath, Whitchurch on Thames, Kidmore End and Mapledurham

Emerging South Oxfordshire Local Plan

Consultation on

Proposed Main Modifications

Main Modification 12 Para 4 Section iii

STRAT9: Land adjacent to Culham Science Centre

Page Number 32

The opportunity should be taken for placing the power lines that cross the site underground. It should be unacceptable for a new development to be bisected by high voltage (132kv) power lines, when such lines are today often required to be placed underground when being built for new windfarms. The cost of such work is relatively modest, and, compared to the improved environmental improvement that will result is absolutely essential. Most urban areas have such power lines underground, and the value of this was recognised at the Olympic Park in East London, when the lines crossing that site were retrospectively placed underground. Even Bracknell New Town has recently put 132kv power lines underground alongside a new development site. The environmental improvement achieved through undergrounding the power lines would be the compensatory improvement required under NPPF 138, which otherwise does not appear to achieved in respect of this strategy

Changed Wording

iii) ~~a layout that recognises the overhead power lines on the site and avoids the built form beneath these where possible;~~ **the underground power lines on the site should be placed underground**

Main Modification 15 Page 46

Policy STRAT11: Land south of Grenoble Road

The opportunity should be taken for placing the power lines that cross the site underground. It should be unacceptable for a new development to be bisected by high voltage power lines, when such lines are today often required to be placed underground when being built for new windfarms. The cost of such work is relatively modest, and, compared to the improved environmental improvement that will result is absolutely essential. Most urban areas have such power lines underground, and the value of this was recognised at the Olympic Park in East London, when the lines crossing that site were retrospectively placed underground. Even Bracknell New Town has recently put 132kv power lines underground alongside a new development site. The environmental improvement achieved through undergrounding the power lines would be the compensatory improvement required under NPPF 138, which otherwise does not appear to achieved in respect of this strategy. It is notable that the 400kv line is placed underground a short distance away where it runs parallel to the A34 between Botley

and Hinksey to protect views of Oxford so the deleterious effect of power lines is already recognised locally. The presence of high voltage power lines through a residential area gives a clear visual indication that the development is poor quality and is designed for more disadvantaged residents. It will emphasise the social segmenting of the southern outskirts of Oxford, a place of social deprivation, sewage works and edge estates.

Suggested amendment (1) – Add new text:

'the electricity pylons will be undergrounded through the site'.

Main Modification 16 Page s 53

Policy STRAT12: Northfield

The opportunity should be taken for placing the power lines that cross the site underground. It should be unacceptable for a new development to be bisected by high voltage (132kv) power lines, when such lines are today often required to be placed underground when being built for new windfarms. The cost of such work is relatively modest, and, compared to the improved environmental improvement that will result is absolutely essential. Most urban areas have such power lines underground, and the value of this was recognised at the Olympic Park in East London, when the lines crossing that site were retrospectively placed underground. Even Bracknell New Town has recently put 132kv power lines underground alongside a new development site. The environmental improvement achieved through undergrounding the power lines would be the compensatory improvement required under NPPF 138, which otherwise does not appear to achieved in respect of this strategy. The presence of high voltage power lines through a residential area gives a clear visual indication that the development is poor quality and is designed for more disadvantaged residents. It will emphasise the social segmenting of south east Oxford .

Suggested amendment (1) – Add new text:

'the electricity pylons will be undergrounded through the site'.

Main Modification 23 Page Numbers 81-82

Policy H1: Delivering New Homes

The exceptions set out for non designated sites do not distinguish between the sites within developed areas and those in the countryside, as set out in in NPPF 79. There is a long standing national position against the development of isolated homes in the countryside, which, if it was restated in this policy, it would be helpful for decision makers. The policy as it stands is highly subjective, as redundancy (para vii) is nothing more than the consideration of alternative economic uses, which can be designed in at the point of original conception and construction to take advantage of this policy to frustrate NPPF79. In respect of designs being innovative or outstanding or of exceptional quality,(para viii) this is a test that has failed the test of time as often as it has succeeded, and ambitious architects with

wealthy clients have used this rationale to bully planning authorities and members. Such designs can have a seriously adverse effect on countryside locations, as the reciprocal of the desired extensive view from a development is that the development in turn is visible, and obtrusive, from the surrounding areas.

Existing proposed medication and additional wording in larger type

~~vi~~ **vii.** ~~it is a proposal involving the sensitive, adaptive re-use of vacant or redundant building(s). Provided that the building(s) in question are proven to not be in a viable use as required by other policies of this Plan.~~ **It would bring redundant or disused buildings into residential use and would enhance its immediate surroundings; buildings erected under agricultural exemption rights since January 1 2001 are excluded or**

~~vii~~ **viii.** **The design is outstanding or innovative and of exceptional quality and would significantly enhance its immediate setting. In rural areas, the landscape as well as the immediate setting must be enhanced**

Main Modification 35 Page Number 110

Policy H18: Replacement Dwellings

The protection that should be afforded to development within the AONBs should not be weaker than the protection offered to the Green Belt. Although not designated as such, the Chilterns AONB performs a similar function in respect of Reading as the Oxford Green Belt does in respect of Oxford.

It is helpful to decision makers to have policies which are relevant to the AONB included in the Local Plan

iv) within the Green Belt **and within an AONB**, the proposed replacement dwelling is not materially larger than the original* dwelling; and

Main Modification 37 Page Number 112

Policy H21: Extensions to Dwellings

The protection that should be afforded to development within the AONBs should not be weaker than the protection offered to the Green Belt given its statutory designation. Although not designated as such, the Chilterns AONB performs a similar function in respect of Reading as the Oxford Green Belt does in respect of Oxford.

It is helpful to decision makers to have policies which are relevant to the AONB included in the Local Plan

1. Extensions to dwellings or the erection and extension of ancillary buildings within the curtilage of a dwelling, will be permitted provided that: i) Within the Green Belt **and within an AONB**, ~~outside of the built form the larger and smaller villages the proposed extension or alteration does not result in disproportionate additions over and above the size of the original* dwelling or ancillary building~~ **the extension or the alteration of a building does not result in disproportionate additions over and above the size of the original* building;**

Main Modification 52 Page Number129

Policy ENV1: Landscape and Countryside

A significant area of the district is covered by the Chilterns AONB, and the Chilterns Conservation Board have a policy in respect of the Chilterns that should be included in the Local Plan. Much of the policy is included in this plan, but there are two significant points which have been omitted, which it would be helpful for decision makers to be included as bullet points in para 1 of ENV 1

Suggested Wording to be added

- in respect of the Chilterns complies with the Chilterns Building Design Guide and technical notes by being of high quality design which respects the natural beauty of the Chilterns, its traditional built character and reinforces the sense of place and local character; and
- avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.

Policy CF1: Safeguarding Community Facilities

The Policy is helpful in ensuring that Community Assets are safeguarded, but when an asset has been nominated and designated as an Asset of Community Value, it should be given a higher level of safeguarding, as to achieve that status there has been a significant investment by the community and the Local Authority. Such Community facilities should therefore have a higher level of safeguarding reflected in the policy, and the interests of the original nominating Community Interest Group recognised. This proposed modification distinguishes between Community Facilities in general, and those with ACV status

Suggested Wording

1. Proposals that result in the loss of an essential community facility or service *, , through change of use or redevelopment, will not be permitted unless:
 - i) it would lead to the significant improvement of an existing facility or the replacement of an existing facility equally convenient to the local community it serves and with equivalent or improved facilities;
 - ii) it has been determined that the community facility is no longer needed; or
 - iii) in the case of commercial services, it is not economically viable.....

...* Facilities under Use Class F2 Local Community Uses (shops smaller than 280 m² and without another shop in 1,000 m², a hall or meeting place for the principal use of the local community, outdoor sport or recreation locations, and swimming pools or skating rinks),

Use Class F1 Learning and non-residential institutions, and the following Sui Generis uses: drinking establishments, cinemas, concert/dance/bingo halls, theatres.

2. Proposals that result in the loss of facilities listed as Assets of Community Value under the Assets of Community Value Regulations 2012 through change of use or redevelopment, will not be permitted unless:
 - i) it would lead to the significant improvement of an existing facility or the replacement of an existing facility equally convenient to the local community it serves and with equivalent or improved facilities;
 - ii) it has been determined, and agreed by the relevant nominating Community Interest Group, that the community facility is no longer needed