

## 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](mailto: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.

#### 1. Personal Details

#### 2. Agent Details (if applicable)

Title	<input type="text" value="Cllr"/>	<input type="text"/>
Full Name	<input type="text" value="Robin Bennett"/>	<input type="text"/>
Organisation (if relevant)	<input type="text"/>	<input type="text"/>
Job Title (if relevant)	<input type="text"/>	<input type="text"/>
Address Line 1		<input type="text"/>
Address Line 2		<input type="text"/>
Address Line 3		<input type="text"/>
Postal Town		<input type="text"/>
Postcode		<input type="text"/>
Telephone Number		<input type="text"/>
Email Address	<input type="text"/>	

### 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](https://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](https://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

MM13

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.

## Policy STRAT10 – 2(i)

I support the inclusion of Garden Village principles but the key element of community ownership on perpetuity is not explicitly stated. I would add:

2 (i)... residents involved in **ownership and management of** managing space and facilities

Para 4.80 Explanatory text: it would be sound to include a reference to Community and Trusts, given support for this model at council and Oxfordshire-wide level. There is no harm adding this given the draft text only says “likely”.

It is likely that to achieve this the mix will include a higher proportion of units that meet the NPPF definition of ‘other affordable routes to home ownership’ such as shared ownership, **and a locally-owned community land trust offering affordable part-ownership.**

### Para 4.82

I have major issues with the text here, as it undermines the central premise of this allocation and its release from the green belt: the comprehensive regeneration of Berinsfield. While I welcome an element of flexibility to the delivery to meet the needs of the community and local groups and charities, the downgrading implicit by removal of the word ‘new’ in all categories implies a cheapening of the regeneration package, and I’m not clear why this is or how it is justified. The additional cost of off-site strategic roads at Golden Balls or Culham should not be used to strip out the vital regeneration package.

Text currently reads:

The council’s most recent evidence suggests that the **necessary** regeneration **package** will need to include the following:

- ~~new~~ premises for Berinsfield children’s centre;
- ~~new~~ and expanded premises for Abbey Woods Academy **or a new primary school**;
- ~~new~~ premises for the Adult Learning Centre;
- ~~new~~ and expanded premises for a health centre;
- **upgraded or** new premises for the Abbey Sports Centre, ~~including a replacement swimming pool of regulation length and a four-court (34.5m x 20m) sports hall~~; and
- a ‘community Hub’ building – a flexible community space that enables the co- location of a range of different users and groups

I would reinstate the word ‘new’ in each case and add ‘or comprehensively refurbished and upgraded’, with the decision on which approach is best agreed with the likely long-term occupiers/managers of each facility.

(Continue on page 5 if necessary)

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.

Please provide your summary below:

**Thank you for your comments.**

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Cllr Robin Bennett – additional proposed amendments to modifications.

MM2 support - though note I am not convinced that the plan does this, not least in the inaccessible Chalgrove site.

MM3 I support this new bullet on climate change.

MM5 I have concerns that the plan oversupplies comprehensively against this requirement including substantial supply after the plan period (aside from concerns that the requirement is itself too high and the SHMA numbers are based on a growth scenario that has been superseded by events). Given that emissions associated with each new-build and loss of carbon sequestration in soils etc, this is incongruous with the strategic goal on climate in added in MM3.

MM6 1 (v) Strike a balance to provide for housing **growth** and economic **growth**; Should replace the word 'growth' with 'needs'.

Figure 1 (garden town principles)

Local Character - The Garden town will establish a confident and unique identity, becoming a destination in itself that is distinctive from surrounding towns and villages whilst respecting and protecting their rural character and setting. Didcot's identity will champion science, natural beauty, and green living, in part delivered through strengthened physical connections and active public and private sector collaboration with the Science Vale, **ADD as well as celebrating the town's historic and industrial heritage.**

MM9 Green Belt. I welcome the demand for compensatory improvements, and suggest adding the word '**ambitious**' or '**comprehensive**', although I am still dismayed at the loss of green belt this plan entails.

It would still appear incompatible with the NPPF to make such extensive use of green belt land for 6 out of 7 of its strategic sites as this plan does.

MM12 land at Culham:

Although I do not support this allocation, if it is to be included then I would suggest:

Para 1 - site should not provide allocation beyond plan period, and no reason to increase supply number from 1850. Lower number would allow better containment.

Para 4 (ii) a permanent defensible edge to protect the Oxford Green Belt **ADD using the existing boundary of Thame Lane as the outer limit of the built area.**

MM15 Grenoble Road

Para 3 (ii) **ADD a scheme for long-term community stewardship of the planted woodland should be established as part of the masterplan, in tandem with local wildlife/countryside charities or trusts. This community woodland should be at least 200 metres deep.**

**Rationale:** this woodland will benefit both the existing and new communities in terms of access to countryside, visual amenity, air and noise pollution and will relate well to the Sandford Brake SSSI.

MM16 Northfield – noting that I do not support inclusion of this site as I don't consider it connects legibly or in transport terms to the city of Oxford (I disagree with para 4.103).

Include same wording on Community woodland as requested for Grenoble Road- given this site has even more direct impact on the villages of Garsington and Horspath. The Northfield developer at the EIP offered to provide a Community Woodland of 200m depth, inclusion of this in the Main Modifications, would ensure this offer is implemented and would be a valuable mitigation to these seriously impacted villages.

MM16 PARA 3 Requested amendment: .....prepared in **consultation** collaboration with the Local Planning Authority, **while also engaging with neighbouring authority** Oxford City Council.

Rationale – to emphasise that SODC is the lead LPA and has final say on the masterplan.

MM17 Land at Bayswater Brook: I propose this site allocation should be removed.

Para 2 (vi) 'all necessary facilities for movement'... whilst I welcome the idea that a development could be car-free or low in car use, I did not see at the EiP or in currently visible documentation sufficient evidence that this can be achieved for this site, nor is the modelling or policy framework in place to ensure it happens properly. This can only lead to spiralling costs and insufficient infrastructure, enough to render the site unviable as well as causing major loss in amenity for existing residents of Sandhills, Elsfield and other surrounding locations.

This amendment seems to suggest a highly risky approach; this site should be removed from the plan, in my view, especially given the numerous other constraints of archaeology, ecology etc.

MM30 p.109

Amend text:

~~The private sector is a key player in bringing forward specialist schemes for older people, and full encouragement is given to such~~ **specialist schemes for older people** on sites close to public transport and local shops and facilities.

I don't know why it is necessary to mention the 'private sector'; this is currently the only sector delivery most forms of housing in the district, and if the council delivery vehicle or similar starts in 2021, it could easily consider delivering these types of schemes too.

MM46 – I am still disappointed that the text about CEPs has been deleted and consider there to be no harm, and much benefit, in reinstating it.

MM66 – I welcome the added references to long-term stewardship

MM70

DES 10- I welcome the encouragement of “the incorporation of renewable and low carbon energy applications within all development” and “connection readiness for decentralised energy networks”.

MM71 – I welcome new policy DES11;

I would prefer that the % reduction in 2026 was increased to **75% reduction** in carbon emissions as a better and more ambitious signal towards meeting the 2030 zero-carbon target.

3. An Energy Statement will be submitted to demonstrate compliance with this policy for all new build residential developments (other than householder applications) and new-build non-residential schemes over 1000m<sup>2</sup>. The Energy Statement will include details as to how the policy will be complied with and monitored, **ADD and details of the embodied carbon and construction emissions of the project.**

Rationale: it is important that developers at least start to consider these other major carbon emissions associated with construction – many already do so this request should not be a burden. This reinforces the explanatory text at Para 9.39 below:

Para 9.39 proposed amendment:

...The Council would also encourage similar reductions in terms of construction emissions and would implore developers to consider a development's overall carbon footprint and opportunities to reduce carbon emissions from the construction of infrastructure, ~~through~~ **with offsetting as a last resort.**

Rationale: the intent should be to remove the emissions from construction, not to use offsetting as permission to continue with business as usual.