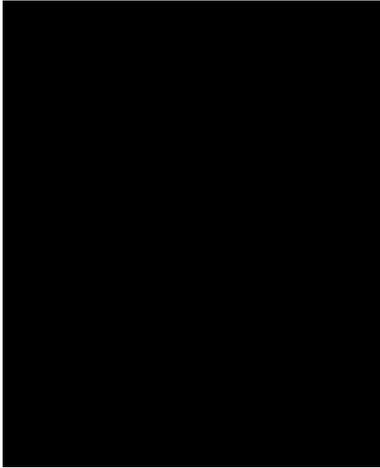


# Emerging South Oxfordshire Local Plan Proposed Main Modifications Consultation

## 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>	Dr
<b>Full name</b>	Sue Roberts
<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

MM5 STRAT2

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.

This modification increases the number of homes to account for additional years at the end of the plan to bring it out to 2035. 1100 homes a year in these late years is at the higher end of the average yearly growth because of the 'stepped trajectory'. This enormous number, just as population growth in England is bottoming out to near zero.

We have previously shown that we shall be building 3-5 times the number of homes we can fill. Why? Government makes clear in its white paper that it intends to flood the market which could result in a housing crash. But flooding the market does not in fact bring down prices in a near-infinite market; nor would it when prices are buoyed up by Government subsidies such as Help to Buy.

At the Local Plan Hearings, developers argued that adding up ONS population growth projections across England would never reach the Government's 300,000 per year target for England. Indeed so: 300,000 is far far too many, almost twice the number we can fill, with an average increase in households of 160,000 between 2011 and 2035. ONS projections for South Oxfordshire show 8000 to be the right number of homes for the whole period.

As for the affordability crisis - it is not caused by a lack of physical dwellings - it is due to miserable wages which have gone down in real terms. Affordability is solved by controlling rents and allowing homes to be bought for residential use only.

The elephant in the room remains the extremely high number of homes: 30,100 planned over a period when only 8000 new households are expected to form (2011-2035). In fact, 8000 new homes have already been built. No more are required.

With windfalls, infills, smaller settlements, higher density on strategic sites and 2815 post-2035 homes, land is provided for 41,000 homes.

23,500 of these homes must be built or the people of South Oxfordshire will be penalised. For every home to be occupied, we have provided building land for 4 empty units.

Would new residents come from London? High targets have been set across the country. If people rush to South Oxfordshire, they will leave empty homes being constructed where they come from.

Over-targetting homes leads to instability and insecurity. We do not have the resource to build fast enough to meet the 23,500 target. The Covid19 recession will slow build-out as the market slows.. A failure by developers to meet council targets exposes South Oxfordshire residents to more speculative land-grabs due to the grossly unfair 5-year land supply rules.

Why are we building new employment provision as Covid19 surveys have shown most people prefer to work at home? Why build new homes on Greenfield land when offices are being converted to residential? Why has the allocation of land for employment not been massively decreased to reflect current reality? Is it because of the financialisation of land?

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.

*No Response*

Q9. 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

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 Proposed Main Modifications

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

MM4 STRAT1 Spatial Strategy

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.

Spatial strategy has not been amended to put nature first.

Nature Recovery Network (NRN) planning is beginning to take place. It is appreciated for the higher level plans (Oxfordshire 2050, the OxCam Arc) that NRNs must follow existing nature. Nature cannot be transplanted. Any housing development, were it needed, must not disrupt these all-too-important efforts to restore wildlife.

As these homes are not needed, as there is more housing per person in this country than there has ever been (Ian Mulheim), any future planning, post-2035 when we may need a small number of new homes, should be disported in such a way as to leave safeguarded NRNs intact.

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:

Schedule of Proposed Main Modifications

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

MM8 STRAT5 Residential Densities

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.

Were we to need more homes, we should built densely. Mr Bore, the Inspector, prefers graded transition from countryside to town. This sounds like suburbia, like the East Coast of America visible as a stream of light from outer-space where there are no gaps between conurbations.

Is this just a matter of taste? I prefer the Continental method, with distinct lines where the town starts and the countryside ends. This is how building has traditionally been done in rural South Oxfordshire, keeping

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.

our settlements distinct.

Densities should be as high as possible to reduce land-take. Denser homes tend to be the smaller ones which, if we required any new homes at all, would be the ones that we could use.

The removal of required minimum densities is a highly retrogressive step, as is the suggestion of minimum densities 'where relevant' of only 45 dpa. This replaces requirements for 70dpa.

Since the Local Plan Hearings, the film Kiss the Ground has been released. The degradation of our soils is reducing our land, irretrievably, to dustbowls. We grow arable crops in South Oxfordshire on the chalk escarpments, almost hydroponically, on rubble. To have any hope for our own future in this country, we must restore our lands and our degraded soils. We must safeguard land that is not covered in concrete, restoring it for nature, to grow food, or both.

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?

Yes, I'd like to make another comment

## Part B - your comments

Q20. 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

Q21. 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

MM17 STRAT13 Land north of Bayswater Brook

Q22. 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.

It is very welcome that the Inspector suggests that no new roads need to be built to link this site to Oxford. And welcome too that active and public transport would be prioritised.

Stern requirements would need to be in-place to ensure that such a high number of (unneeded) homes does not generate traffic that will make living conditions unbearable for all. It is hard to see how Oxford key workers would access this site easily.

Any new settlement here, and indeed everywhere, should be built only if the houses are required.

Cars should be designed out of settlements in keeping with a 21st century vision of healthy place-shaping. All new settlements should comprise walking-streets, and be extremely well serviced with public transport and cycleways.

Q23. 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*

Q24. 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

Q25. 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

Q26. 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

MM25 Policy H3 Housing in Henley, Thame and Wallingford

Q27. 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.

Housing allocations in the market towns have now been set as minima rather than as absolutes. The allocations are for 15% over and above the numbers in the Core Strategy. In the case of Wallingford, since 2011, allocations (including from the Core Strategy), windfalls and speculative grabs amount to a 43% increase in homes by 2035.

Mr Bore, The Inspector, stated that Neighbourhood Plans should not act as a cap on building. What with that and the conversion of 15% from an absolute to a minimum, there is no upper limit to the development that could take place in our beleaguered towns.

This is quite wrong, in the context of the fact that none of these new homes are needed to accommodate the people of South Oxfordshire. For every home built and occupied, another in South Oxfordshire must fall empty, according to the statistics (household projections from the Office for National Statistics).

Q28. 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*

Q29. 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

Q30. 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

Q31. 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

MM52 on Policy ENV1

Q32. 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.

Since the Local Plan Hearings, David Attenborough has presented his testament, 'A Life on This Planet'. We are deeply into the sixth extinction, and wilderness where plants and animals can thrive makes up only a third of our planet surface. The survival of our own species hangs in the balance. We are not gods, but a part of natural ecosystems. Ours is the 189th most nature-degraded country in the world. In the South East, Oxfordshire is the county with the least access for residents to natural spaces, of all counties outside London.

Concreting over land that could be restored for wilderness, or used for food, or both, cements in our nemesis. We should be aiming to restore our land for nature to the state it was in, at its best, since 1970. Once that has been done, we should aim for the best since 1950, and then for the best since 1890, and so on.

I suggested, and still suggest, that we use this policy wording for ENV 1:

Habitats must be provided to restore biodiversity and bioabundance to the maximum levels at which they have been, since 1970. The percentage gain to achieve this will need to be assessed for each development site, and will often be a multiple of the current status.

Offsite offsetting may be required. Such offsetting should restore at least the same area of land as the development consumes over its whole site of built and unbuilt land. Such offsite offsetting must be within South Oxfordshire District.

In keeping with the Environment Bill, all sites must demonstrate at least a 10% gain in biodiversity on-site.

In addition to ensuring biodiversity and bioabundance gain on-site, there must be a coherent plan for swathes of land, and water if relevant, from within to without the site to ensure continuity of habitats for

Q32. 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.

plants and animals, and to contribute to landscape-scale nature recovery across the district and beyond.

To demonstrate compliance with this policy, habitat assessments and species-level monitoring should be made and continued with during development and for at least 5 years after the development is complete.

Q33. 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*

Q34. 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

Q35. 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

Q36. 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

MM69 and throughout the modifications

Q37. 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.

To reach net zero carbon in the district by 2030, the Council's target for South Oxfordshire, everything built from today must be zero carbon and should be negative carbon. Please replace all instances of 'low carbon' with 'net zero or negative carbon'.

Q38. 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*

Q39. 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

Q40. 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

Q41. 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

MM71 Policy DES11: Carbon Reduction

Q42. 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.

Each week brings further disastrous news on global heating.

During the Local Plan Hearings, flooding in Wales began: Storm Francis hit, causing landslides and forcing people to evacuate their homes. California has been ablaze with catastrophic loss of land, homes and life. The Siberian Arctic tundra has been burning fiercely for the first time ever.

South Oxfordshire District Council has a net-zero target for the district, of 2030. This Local Plan destroys all hope of that by the urbanisation of the district with unneeded homes.

Every home built adds 50 to 100 tonnes of carbon dioxide in its construction phase, and 5 tonnes per year in operation.

Whilst this modification shows intent for zero carbon, and implores developers to do better, it is still the case that every home built adds to our greenhouse gas emissions.

I suggested, and still suggest that we use this policy wording for DES11:

The whole lifecycle including construction and demolition of all new buildings whether residential or non-residential, must be demonstrated to emit net zero or negative carbon.

All new buildings must be built to ensure that in their operational phase they emit net zero or negative carbon.

This standard for the construction phase may be secured through minimising embedded carbon whilst maximising 'locked-in' carbon for example through the use of plant-based construction materials such as wood. For the operational phase, insulation and on-site renewables can achieve the required standard.

Suitable accreditations should be used to demonstrate net zero carbon for the operational phase of the developments, such as Passivhaus standard or BREEAM 15 points.

A carbon-account should be made of all infrastructure associated with development that cannot be net zero carbon, such as roads, and offsetting of that carbon should be created within South Oxfordshire District such as through growing new woodlands.

Q43. 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*

Q44. 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