

## 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="Mrs"/>	<input type="text"/>
Full Name	<input type="text" value="LucyDalby"/>	<input type="text"/>
Organisation (if relevant)	<input type="text" value="Culham Parish Council"/>	<input type="text"/>
Job Title (if relevant)	<input type="text" value="Parish Clerk"/>	<input type="text"/>
Address Line 1		<input type="text"/>
Address Line 2		<input type="text"/>
Address Line 3		<input type="text"/>
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General Comments

Please provide your comments below:

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## **OMISSIONS FROM MAIN MODIFICATIONS:**

a. The **Southern Abingdon Bypass** is mentioned only in the Local Plan in Policy TRANS3 re safeguarded land, and by a map in the appendices. At the Matter 9 Hearing Session, it was stated clearly by the County Council representative that there is no finance for this major bypass. Recognising that the Main Modifications provide no justification for the 'Southern Abingdon Bypass' it should be removed entirely from the Local Plan.

b. A revised map for the **Didcot-Culham Thames River Crossing** is provided in the *Schedule of Policies Map Changes* but there is no mention anywhere in writing that this is a materially significant change from the previous safeguarded routes for such a crossing. It is now more than half a mile (the OCC representative at EiP referred to 600m) closer to Culham village. There is no supporting information on any environmental impacts for this new route, recognising that e.g., noise, air quality, archaeology, etc may be significant to Culham village. Moreover, this new route brings the new roundabout on the A415 considerably closer to the existing T junctions at Thame Lane and Tollgate Road, likely to cause significant impacts on traffic congestion in Culham, which have not been assessed.

As per our final comments under MM12 the following criteria should be part of the Local Plan as regards STRAT9:

- Initial Phasing should start by the station as a condition of any planning consent not across the entire site. Site adjacent to employment land to east of railway to be developed first before future site phasing can commence.
- No work should commence on site until the new River Crossing has reached Practical Completion and improvements to the station have been completed.
- All landscaping to the entire site should be commenced at initial phasing stage.
- A larger landscaping gap or a site gap between the site and Europa School so Culham does not become a continuous delineated settlement with this new development.

## **Minor Modifications which should be considered MAJOR:**

1. One of the failures of the Examination was the refusal of the Inspector to allow anyone to even mention the impact of Covid-19, despite it being widely acknowledged to have caused the greatest economic recession in several hundred years.

It is particularly aggravating to find such a positive spin inserted into the Plan's Vision and Objectives (drafted years before the pandemic). In particular, at para 3.9 p. 20 the Plan states: *"The impacts of COVID-19 on the economy and lifestyle were emerging during the examination of this plan. The plan provides new homes, jobs and infrastructure to meet needs. South Oxfordshire is an area of traditionally high demand and it is reasonable to assume that this will remain the case throughout the plan period. Science Vale and the Oxford-Cam arc is an area which is likely to be important for the country's recovery. The plan contains sufficient flexibility (for example in its employment policies) to provide an appropriate framework for changing lifestyles and needs. If development needs prove slower in coming forward, or change, this will be monitored (see Chap 12). The plan can be reviewed if necessary."*

The likelihood is that vast swathes of Green Belt will have been unnecessarily reclassified and lost forever; whilst sites which are much more suitable for the building of new towns will be land-banked by developers.

2. We would also like to point out that the publication version of the Local Plan and all previous information was misleading as regards the need for the Culham site, as the change and text struck out of 4.69, recorded as a Minor Modification, now acknowledges:

“CSC cannot expand without necessary infrastructure, ~~and this infrastructure is reliant on housing delivery at Culham to part fund~~ including the Didcot to Culham River Crossing and Clifton Hampden Bypass’.

(Continue on page 5 if necessary)

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AppendixA

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## Appendix A – STRAT 9 Land Adjacent to Culham Science Centre, Concept plan

We have several important areas of concern regarding the new indicative concept map:

1. The Local Centre shows dense housing both sides of the railway tracks (into the Culham No 1 site) therefore putting much greater pressure on the existing houses situated in the immediate vicinity of Culham Station. A planted boundary should exist around the railway as stated above.

2. Why are the positions of the schools removed from the amended map?

3. Why has the red arrow which showed the location of the cycle bridge over the Thames (the position of which we believe has changed) been removed entirely from the amended map? The cycle bridge should be mentioned in text somewhere, if not on the map, because the siting is not clear yet.

5. Thame Lane appears to be sealed off at the Europa School by 'Green Belt Re-enforcement', however existing residents along this route have not been consulted on the implications of this change.

6. The green infrastructure surrounding two houses (i.e. Warren Cottage and Warren Farm House) has been removed. There is no indication as to how these two houses will be integrated into the overall housing development.

7. In general there is much less green infrastructure in this new concept plan which is of great concern.

8. No new '*woodland habitats along the river escarpment*' are marked on the map. It is not clear where these are to be located, including whether they are to be positioned along the river or on the escarpment where the existing motocross track is located.

(Continue on page 5 if necessary)

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MM71

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### **MM71: Policy DES11 Carbon Reduction**

1. iii : *'achieve at last a 40% reduction .... To a 100% reduction in carbon Emissions (Zero Carbon)'*:  
The target of net carbon account of 100% 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.

9.39 p 211. If the council *'also recognise that zero carbon homes are achievable for many residential developments now'* they should INSIST on this immediately allover South Oxfordshire. It should be a firm requirement set in this year 2020. There should be a mention in this MM that the national legislation is not in place for the local authority to enforce this and a statement that this legislation should be created as soon as possible.

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MM27

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## **MM27, Affordable Housing**

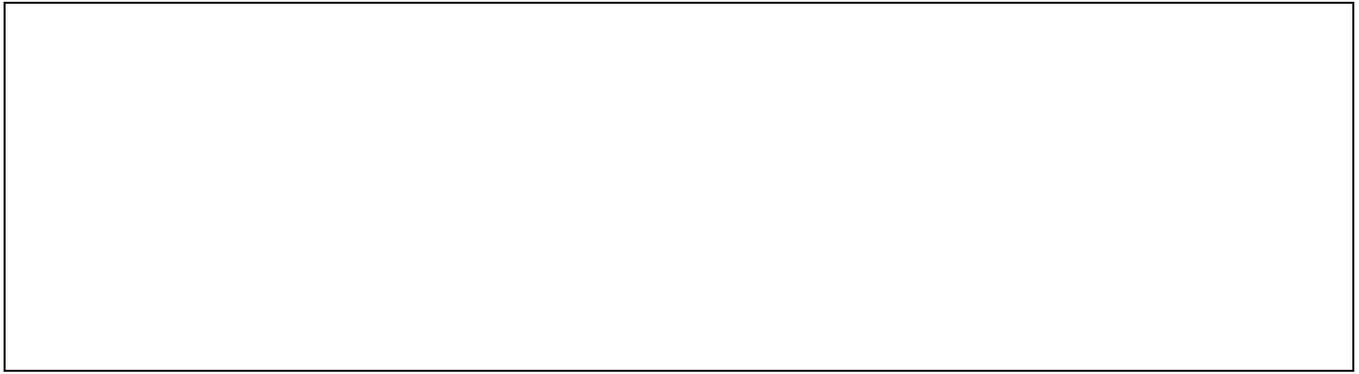
**p 99** pp: 96-97: 'On sites adjacent to Oxford City: 50% affordable housing on all sites with ...' is a political fantasy. (1) 'Affordable housing' refers to housing that is offered at 80% of the market price, not housing that is affordable (say) by 80% of those suffering from housing poverty in Oxford. (2) Housing around Oxford will always be expensive because it will attract London (and likely international) money; (3) 80% of some large price (typically a large fraction of £1M) will not be affordable to a nurse at the JR hospital on an annual salary of £25k; (4) the demand from London will be insatiable, so that the nurse will never see an improvement in housing opportunity; (5) the use of the Green Belt to supply 'affordable housing' is a flawed strategy because locations in the Green Belt will be the most desirable and therefore the most expensive; (6) the hollowness of the argument of 'affordable housing' is amplified by the fact that even this flawed scheme cannot be put into practice: councils propose 40% typically, but the UK average value actually achieved is about 7%.

Reference should be made to the affordable housing ratio in South Oxfordshire at the time of writing as a multiple of median and average incomes.

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MM13

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**MM13 STRAT 10 Berinsfield** (now termed a 'Garden Village')

2.(iv-ix) '*contributions to a new secondary school and Special Education Needs (SEN) provided off site*';

Whilst it has become clear that Berinsfield residents will be encouraged to use the proposed new secondary school to be built on the Culham site, we object that this is not clear from the vague reference to '*off site*' in MM13 and also that this will bring yet more traffic flow to Culham. A secondary school should be built in STRAT 10 boundaries for Berinsfield Garden Village, for the many reasons given at the hearing session on this Strat.

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Individual

Business or organisation

Agent

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#### 1. Personal Details

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

Title	Mrs	
Full Name	LucyDalby	
Organisation (if relevant)	Culham Parish Council	
Job Title (if relevant)	Parish Clerk	
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
Postcode		
Telephone Number		
Email Address		

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MM12

Please provide your comments below:

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## MM12 / Land adjacent to Culham Science Centre

**We re-state that the exceptional circumstances as stated in the Plan are not exceptional for the extent of Green Belt land proposed to be taken out for development. There is a good amount of brownfield sites in next to CSC. Urbanisation of this area is not necessary for its economic success.**

p. 52: *'a net increase of **at least** 7.3 ha of employment land...'*

We have strong objection to the addition of the phrase *'at least'*. The Matter 9 hearing session is referenced here as the stage the modification was proposed. We do not recall this nor is there any reasoning or evidence given for turning even more Green Belt into employment land.

p 52 new para 5. *'Proposals will be expected to deliver low carbon development and renewable energy in accordance with STRAT 4'*: As stated above, the statement describing how to achieve low carbon emissions and facilitate renewable energy generation in STRAT 4 has not been issued. It is important to emphasise that development at Culham should be 100% zero carbon before any building commences.

p 53: (section 3 vii): *'new junctions onto the A415 and significant contributions towards the Clifton Hampden Bypass, the Didcot to Culham River Crossing and upgrading the A4074/B4015 junction at Golden Balls'* is an endorsement of OCC's HIF1 road plan. The new junction is significantly closer to Culham and outside the safeguarded land illustrated in the publication version of the plan.

This plan has major failings because it does not acknowledge: (1) the traffic overload that will be created (OCC's own predictions); (2) the damage to human health from air pollution, especially from the spur of the (dual carriageway) A34 through Didcot; (3) the impact on Abingdon; (4) the fact that a new road will always generate new traffic, which is directly contrary to the requirements of MM2.

MM omission: The impact on Abingdon has not been addressed in any way in the MMs. This omission is a major failing, given that the large increase of traffic into Abingdon is certain to overload the town's central road system and its facilities, and to add to the town's existing pollution problem.

p 54. Point 4: *'a layout that recognises plans for improvements to Culham railway station ...'* ignores the facts that: (1) Culham station is merely a rural railway halt (with listed historical buildings); (2) there is no actual existing or reasonably foreseeable plan for the expansion of Culham station; (3) any development would be a major undertaking; (4) an expanded station would become a gateway to London (not specifically the Culham Science Centre), and confirm Culham's status as a commuter town; (5) access to an expanded Culham station would increase the road traffic on the A415, already predicted to be overloaded (OCC's own predictions); (6) Green Belt land would be destroyed to make car parks for the station. No mention is made of the public house and existing housing around the station.

p. 54, para ii-iiii [new]: New criterion ii: *"a layout that delivers higher density development (a minimum of 50dph) along the principal internal transport corridors, adjacent to the local centre and railway station, provided it does not adversely impact any existing heritage assets. Density should then gradually reduce from these locations outwards to provide a transition across the site, with lower density development located on the northern, southern and eastern edges of the site, to create a permanent defensible edge to protect the Oxford Green Belt"*.

We fail to see how simply lowering density of development towards northern, southern and eastern edges will create a *'permanent defensible edge'*. Further mitigatory measures and a permanent boundary are required.

Green Belt compensation - We suggest woodland boundaries, including field hedgerow. This should be the case along the railway edge also. Thame Lane is the obvious boundary to the north and the MM for this should state this, reducing the overall size of the land inset from Green Belt. The boundary with the Europa school should also have woodland/planting to obviate possible complaints of new residents about the noise of a school. This planting (of many 10s of metres) may also go some way to mitigate the impact of increased traffic on the existing and new roads that this development would inevitably make.

As above, (iii): *"a layout that recognises the overhead power lines on the site and avoids the built form beneath these where possible"* is not indicated as a new phrase but this has not been mentioned in prior versions of the Plan. Published research shows that the strongest magnetic fields are usually emitted from High Voltage transmission lines. To ensure that exposure levels are below 0.5 milligauss (mG), a safety distance for housing measuring at least 700 feet is required.

p. 54 (4.iv): The addition of the words: *'considering the contribution of the site to the setting of Oxford'* does nothing to mitigate the damage that will be done to the contribution this site makes to the setting of Oxford and its river approach. The planting and woodland mentioned above may make some contribution to this.

p. 54, para 4 (x). The 'New criterion x: 'a net gain in biodiversity ... Any residual biodiversity loss should be offset through a recognised biodiversity offsetting scheme' is implausible for the reasons given above (for STRAT6, MM9). In summary: (1) environmental expenditure is an external cost that financial forces will always try to minimize; (2) there are no specific mechanisms for legal enforcement and review; (3) any remedial action will be incommensurate with the scale of the damage to Green Belt lost to development. A new woodland cannot replace areas formerly occupied by mature woodland and other habitats. The land where the housing development is taking place is currently home to hundreds of species of wildlife including deer, hares, foxes, bats, birds of prey (i.e. peregrine falcons, barn, tawny and little owls), skylarks, yellowhammers, linnets, corn buntings and many other species. This existing biodiversity will be lost forever and cannot be offset by any offsetting scheme at the site.

No new *'woodland habitats along the river escarpment'* are marked on the concept map. It is not clear where these are to be located, including whether they are to be positioned along the river or on the escarpment where the existing motocross track is located. As mentioned above, none of the area north of Thame Lane should be inset from Green Belt and while we do not accept the exceptional circumstances exist for any development outside brownfield sites in this Strat; if any land is to be taken out of Green Belt it should be only in the area south of Thame Lane to the A415.

p. 55 . The phrase: *'Proposals will need to take account of Policy EP5: Minerals Safeguarding Areas. This policy encourages developers to extract minerals prior to non-mineral development taking place, where this is practical and environmentally feasible'* is meaningless. The Publication version stated that the layout *'takes into account the mineral safeguarding to the north of the Culham site.'* No other reference is made to the locations, areal extent, depth, potential timescale, environmental impact and other parameters associated with this mineral development. ? This vague *'acknowledgement of a safeguarding area'* causes confusion and uncertainty.

Hills' application to quarry gravel in Clifton Hampden was refused. This new MM would allow extensive quarrying at Culham before houses are built. The north of the Culham site is a particularly sensitive area because it is the river approach into Oxford and close to the SSSI.

The following criteria should be incorporated into STRAT 9/Culham:

- No work should commence on site until the new River Crossing has reached Practical Completion and improvements to the station have been completed. This is VITAL particularly as CEG have already indicated that they could start construction ahead of this infrastructure.

- Initial Phasing should start by the station as a condition of any planning consent not across the entire site. Site adjacent to employment land to east of railway to be developed first before future site phasing can commence.

- All landscaping to the entire site should be commenced at initial phasing stage.

- A larger landscaping gap or a site gap between the site and Europa School so Culham does not become a continuous delineated settlement with this new development.

**Re Culham: see further comments re Appendix A maps (page 6 of this document)**

(Continue on page 5 if necessary)

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

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Full Name	<input type="text" value="LucyDalby"/>	<input type="text"/>
Organisation (if relevant)	<input type="text" value="Culham Parish Council"/>	<input type="text"/>
Job Title (if relevant)	<input type="text" value="Parish Clerk"/>	<input type="text"/>
Address Line 1		<input type="text"/>
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MM11

Please provide your comments below:

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## MM11 p. 51 / STRAT 8 Culham Science Centre

Green Belt release has increased from 73 ha to 77 ha. We object to this extra Green Belt release. There has been no adequate reason given for why the 'apron' at the entrance to CSC needs to be taken out of Green Belt or what compensatory measures will be offered; this apron has several large trees and mown grass areas. Proposal for the new road and roundabout connecting to the Clifton Hampden by-pass in this area is not an adequate reason for this area to be taken out of Green Belt because under planning rules roads are permitted to be built in the Green Belt. The draft Masterplan SDP for Culham Science Centre 2014 has never been adopted because one of the issues was the apron area. Clifton Hampden agreed to take this area out of their NDP area on condition that the CSC Masterplan SDP would not include new building on this area. See minutes from Cabinet meeting here:

<http://democratic.southoxon.gov.uk/mgAi.aspx?ID=2197>

In this meeting, it was agreed that an amended part to the Masterplan SDP would be taken to CSC for agreement. As the SDP was never adopted, we assume they did not agree, in which case it was meant to come back to Cabinet for further discussion; this does not seem to have happened. The then Principal Planning Officer Peter Canavan was the report writer and therefore we assume the officer in charge of this SDP. He now works for the site promoter for this site.

This history shows the contentiousness of building on the apron for the local community. In the hearing on this matter, the apron was not discussed. In the Inspector's visit to CSC with Cllr Sam Casey-Rerhaye and Mr Sensecall of the site promoter, a conversation took place early on in the visit, between the Inspector and Mr Sensecall, about the apron and how it was to remain in the Green Belt. The Inspector did not invite any comments on this issue from others on the visit.

The revised Strategic Allocation Map and Green Belt changes map also give no indication or further detail (and does not even make clear where the boundaries have been changed).

p. 51 subcategory 1. Since one of the chief defining characteristics of Green Belt is openness we object to the removal of: '*openness of surrounding Green Belt*'. The replacement wording: '*character and appearance of the surrounding countryside*' does not recognise that part of the site will still be bordered by Green Belt. It is vague and unhelpful wording.

We have always maintained that it is not necessary to remove Culham Science Centre (CSC) from Green Belt for its 'redevelopment and intensification'. Planning permissions have been and continue to be granted. Indeed removal of this land from Green Belt is directly contrary to paragraph 137 of the NPPF because 'all other reasonable options' have not been examined: The UKAEA is moving its future fusion work from Culham to Rotherham; the JET project will soon close and as Culham is not a nuclear licensed site the new STEP tokamak will not be in Culham. Access to the Culham site is difficult; the A415 and the proposed HIF1 road link to Didcot will be at capacity at peak times (OCC's own predictions). The growth in road traffic generated by the proposed size of expansion of employment at CSC will have a serious negative impact on Abingdon. A compelling alternative is development at Harwell. The UKAEA owns 287 hectares at Harwell. The Harwell campus is already a scientific centre of national importance. It has excellent existing transport links (road, rail, bus) and is directly accessible from Didcot and Milton Park.

Furthermore, there is extensive land on CSC which is currently used as car parking which could be used for new buildings, especially as there are plans to increase the frequency of trains to Culham station, electrification and eventually 4-tracking of this line.

(Continue on page 5 if necessary)

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LucyDalby

Organisation (if relevant)

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Address Line 1

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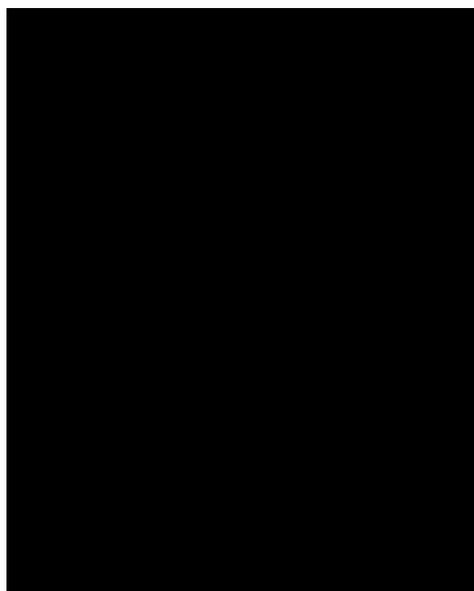
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MM7

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#### **MM7 STRAT 4/ STRATEGIC DEVELOPMENT**

p40: *'A statement of how it is intended to achieve low carbon emissions and facilitate renewable energy generation'.*

It is not clear how this will be accomplished or in fact when the Statement referred to in the document will be prepared, how the commitments will be monitored and enforced and who will be accountable for delivering on this commitment.

Suggested text should be added and further additions in line with the paragraph above:

*'A statement of how it is intended to achieve zero greenhouse gas emissions and facilitate renewable energy generation, low energy and low water consumption. A statement of how it is intended to contribute to greenhouse gas sequestration in line with the Climate Emergency motion passed by the Council in April 2019 and the Council's net-carbon targets of 2025 and 2030.*

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MM5

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## **MM5 / HOUSING AND EMPLOYMENT REQUIREMENTS.**

Sub-section 3, pp34-35. It is not sound to have determined that the previously stated maximum employment land requirements are now not only the minimum requirements but that they are increased. This is especially the case when they are based on the economic growth forecasts in the 2014 SHMA which is now 6 years old and therefore out of date even before Covid-19 and Brexit. These two events should mean a new needs assessment is urgently required to prevent development in the wrong place and in the wrong quantity.

### Suggested change:

In line with the [suggested change in the] Spatial Strategy, employment land requirements should be constrained to increasing density in existing employment sites, except where a made NDP has allocated land for employment, and none in the Green Belt, until a new employment and housing assessment need is undertaken as the 2014 SHMA is too old to be relied upon.

(Continue on page 5 if necessary)

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Individual

Business or organisation

Agent

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#### 1. Personal Details

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

Title	Mrs	
Full Name	LucyDalby	
Organisation (if relevant)	Culham Parish Council	
Job Title (if relevant)	Parish Clerk	
Address Line 1		
Address Line 2		
Address Line 3		
Postal Town		
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Document, section, paragraph or page  
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MM6

Please provide your comments below:

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## **MM6 STRAT 3 DIDCOT GARDEN TOWN**

Subsection 1.iv commits to a *'focus on enhancing rail services to Didcot.'* This commitment requires much stronger resolve, recognising that any new housing at Culham should not occur without a confirmed, reliable and regular train link to Oxford and to Didcot.

Subsection 3: *'infrastructure will need to be in place to enable sites . . . to be delivered.'*

For the avoidance of doubt, this *'infrastructure'* should include rail, cycling, bus service and road improvements fully in place before any building work commences.

(Continue on page 5 if necessary)

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Agent

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

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Full Name	<input type="text" value="LucyDalby"/>	<input type="text"/>
Organisation (if relevant)	<input type="text" value="Culham Parish Council"/>	<input type="text"/>
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MM9

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## MM9, STRAT6 / GREEN BELT

**p 43 onwards** 4.59 Explanatory text states: *'The individual sections within the plan which are relevant to each of these strategic allocations provide specific detail on the approach for its release and mitigation. The Policy requires compensatory measures to be delivered to remediate for the removal of land from the Green Belt. This is required by the NPPF para 138. Each relevant strategic allocation policy where GB has been altered sets out requirements for the site and **some of these measures could be considered as compensatory measures.** ... The compensatory gain would be expected to be demonstrated through the individual site masterplans and secured through developer contributions'*

We fail to see how any of the requirements listed can be considered compensatory or in mitigation for land lost from Green Belt. In fact this section is wholly implausible: (1) environmental expenditure is an external cost that financial forces will always try to minimize (e.g., HS2 planted remedial trees, and let them die to avoid expenditure on maintenance); (2) there are no specific mechanisms for legal enforcement and review; (3) any remedial action will be incommensurate with the scale of the damage to the Green Belt - for instance: the remediation of several hundred hectares of disturbed land (somewhere in the UK), the creation of animal habitats, bird breeding grounds and sites of special scientific interest is unlikely to follow from MM9.

(Continue on page 5 if necessary)

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MM4

Please provide your comments below:

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**MM4 p.28. / SPATIAL STRATEGY.**

Spatial Strategy is flawed. It purports to support growth in locations that help reduce the need to travel. The single main employer at the Culham Science Centre adjacent is highly specialised.. As a consequence, the large housing development at Culham will result in huge amounts of travel out of and into the development site for all purposes. The overwhelming majority of this travel will occur by road, particularly recognising the small railway station at Culham with limited capacity for use as a major commuting hub for at least the next 8 years and realistically, relying on empirical evidence of the electrification of this line, longer. Travel will also be exacerbated by the need for further travel to and from the site from Berinsfield for secondary schooling. There should not be a secondary school sited in Culham but in Berinsfield where it is needed more in terms of even geographical distribution of secondary schools and for social welfare reasons. . The new HIF road and bridge over the Thames is purported to be ready by late 2024, but all involved in this acknowledge that this is a very tight timeline. It is very likely to be later.

The 'New paragraph following 4.10' is simply a specious justification for a continuous built environment in South Oxfordshire and is a re-statement of MM2. The logic is fundamentally flawed because it ignores the fact that Oxford is near London; new houses around Oxford will be advertised in London (and around the world), London money will drive up prices around Oxford, and the large development at Culham will become a commuter town for London. For other Green Belt sites on the edge of Oxford, proximity to Oxford and the purported likelihood of less travel as a result is precisely the reason Green Belt was created. This is therefore not an exceptional circumstance. This was explained in all the Matters regarding the Green Belt sites and the Green Belt session itself.

Suggested change:

Acknowledgement of the land constraints in South Oxfordshire and how this constraint has so far had a very low impact on its economic success, means that growth here should be limited. Concentration on Science Vale is important but should be focused on brownfield sites and it needs to rely on sustainable travel options and acknowledge that an active travel strategy by all partners in the area is necessary because of the serious traffic congestion and air pollution spots in the area.

(Continue on page 5 if necessary)

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MM3

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**MM3 p27. THE STRATEGY.**

The addition of a short sentence that the strategy will '*Contribute to tackling climate change*' is a vague, meaningless and unsubstantiated claim for the Strategy.

This needs more detail.

Suggested addition:

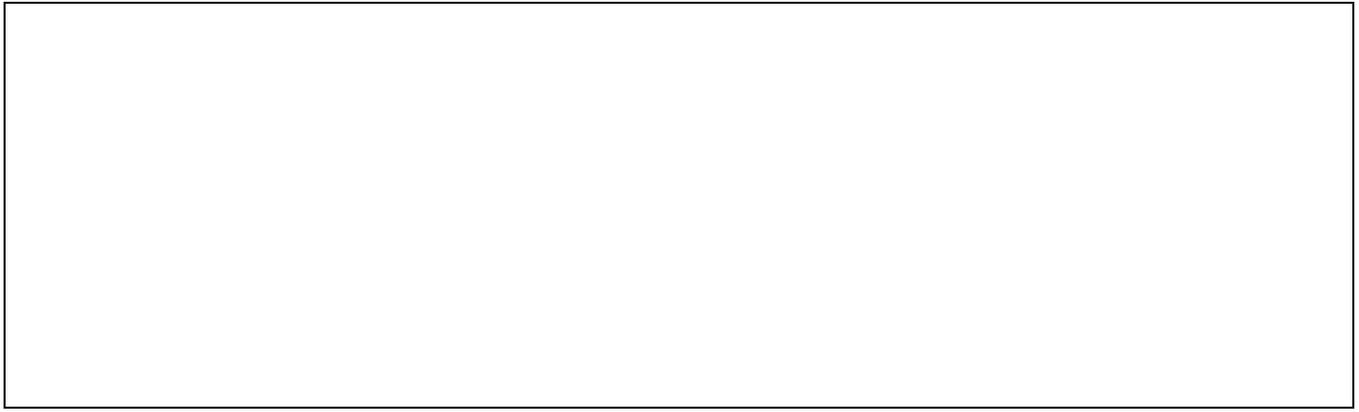
Tackling climate change means one or both of two things: mitigation and adaptation. Mitigation means reducing GHG (greenhouse gases) emissions to zero plus taking measures to absorb GHG already in the atmosphere that are contributing and will contribute further to global heating and feedback loops such that heating and consequent climate disasters are likely to happen on a stepped trajectory. Adaptation means, in terms of planning, development being adaptable to rising temperatures, unpredictable weather events (such a flash flooding and high winds) as well as changes in work patterns and lifestyles, low energy consumption and low water consumption.

As discussed in Examination hearings on this matter.

(Continue on page 5 if necessary)

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MM2

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## **MM2 Strategic Objectives, Schedule,**

p 1: the requirement to 'Minimise carbon emissions and other pollution such as water, air, noise and light' is inconsistent with: (1) the OCC predicted traffic overload on the A415 at Culham; (2) the HIF1 proposal to route a spur of the (dual carriageway) A34 through Didcot. Moreover, the claim: 'Support growth in locations that help reduce the need to travel' is specious: (1) the Plan is for the destruction of much of the Green Belt around Oxford, and will eventually lead to a continuous built environment between Didcot, Abingdon and Oxford. Such development cannot possibly 'reduce the need to travel' around South Oxfordshire; (2) in order to clarify the point: in contrast, in which locations in Oxfordshire would development \*increase\* the need to travel on the metric of (1), and why?

(Continue on page 5 if necessary)

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