

SODC LOCAL PLAN CONSULTATION

DOCUMENTS AND PARAGRAPH HEADINGS OR STRAT NUMBERS FOR REFERENCE WHEN COMMENTING IN CONSULTATION

Guidance Notes on how to respond –

https://files.smartsurvey.io/2/0/HXPSWKPH/SODC_Local_Plan_Publication_factsheet_ONLINE_VER_Jan_2019.pdf

- [South Oxfordshire Local Plan 2034 and appendices](http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=999354516&CODE=8326364FDDB13B6DFA2E373E5AFF5A00) (Low resolution version)
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=999354516&CODE=8326364FDDB13B6DFA2E373E5AFF5A00

CONSULTATION RESPONSE HEADINGS

- **Legal Compliance** – NPPF, Consultation Process
- **Duty to Cooperate** – Housing for Oxford City
- **Soundness** – Everything else

LEGAL COMPLIANCE –

- **NPPF** –
 - Main Plan document **2.3. iv)** page 15 not compliant with NPPF on Green Belt **STRAT 1 , STRAT 6 Green Belt** not compliant with NPPF – specifically opposes the 5 functions of the Green Belt particularly in relation to the City of Oxford –
 - a) **encourages the unrestricted sprawl of large built-up areas** – the City of Oxford
 - b) **to prevent neighbouring towns merging into one another** – Merges Oxford into surrounding parishes and villages;
 - c) **to assist in safeguarding the countryside from encroachment** – destroys the countryside around Oxford
 - d) **to preserve the setting and special character of historic towns**- destroys the setting of Oxford and surrounding villages
 - e) **to assist in urban regeneration, by encouraging the recycling of derelict and other urban land** – discourages this and the building of much needed homes within the City of Oxford
 - **Strategic Housing and Economic Land Availability Assessment (SHELAA) (update - January 2019)**
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=993341613&CODE=797FA2A925923B8E65C18D52C0691780 pages 6 and 7 reasons for excluding sites in NPPF – SSSIs, Ancient Woodland, flood zones 2 & 3
 - NPPF Green Belt – Both Green Belt Studies 2015 and Jan 2019 state that it would be highly harmful to remove Lower Elsfield and Wick Farm from the Green Belt.
- **CONSULTATION PROCESS** –
 - Main Document **1.6, 2.11, STRAT 1, STRAT 2 (housing requirement)**– There has been no previous consultation on this Local Plan. It is a new Plan not a modification of the previous version. The housing development numbers have increased substantially from 22,775 to 28,459 with the addition of 3 new Strategic Development Sites increasing it from 4 to 7.
 - Main Document **1.6, Policy STRAT 13: Land north of Bayswater Brook**– was considered separately in the previous Local Plan Wick Farm and Lower Elsfield 2 separate sites with no linking road. **Bayswater Farm had not been considered at all previously** and is missing from **Strategic Site Selection Background Paper 2**.
 - Main Document **1.6, STRAT 13 - Bayswater Farm** - never been subject to a Section 18 consultation.

- The new Local Plan was prepared in a rush. The background documents were not available electronically to the SODC councillors when carrying out the scrutiny process or when the full council voted on it. Few councillors had the opportunity to be fully informed when voting on it.

DUTY TO COOPERATE

- Housing for Oxford City 4.29-4.31, H9, STRAT 2, Query ‘unmet need’ and ability to commute into Oxford.
Sustainability Study - Options for Meeting Oxford City’s Unmet Housing Need p 10 – opt for Option 1: Do Nothing; since there is no unmet housing need
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=993498942&CODE=EF310981A9A87154C87BE66944A6F8F3

SOUNDNESS – Everything else –

- Policy STRAT 13: Land north of Bayswater Brook p 68-73
South Oxfordshire Local Plan 2034 - Strategic Site Selection Background Paper
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=994974784&CODE=79DBF26D35774E3F413F28278F0D2CB1
Proforma Site Assessment - Lower Elsfield p 143, Wick Farm - p 176
Detailed appraisals – Lower Elsfield and Wick Farm – p 396
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=993498942&CODE=EF310981A9A87154C87BE66944A6F8F3 Sustainability Matrices – comparison table all sites P 15-16 and site selection tables p 20 conclusion below - needs challenging

“Lower Elsfield / Wick Farm Combined Site –

Selected site - In combination, the sites provide an opportunity to deliver new homes in a sustainable location adjoining a major urban area, within close proximity to employment and services and facilities. There is also a high potential for encouraging sustainable modes of travel, once A40 and Bayswater brook barriers are overcome.”

Compare with previous appraisal in 2017 where these sites were rejected - Sustainability Appraisal Appraisals SODC’s Local Emerging Plan – WICK FARM p 127 , LOWER ELSFIELD – p 143
<http://www.southoxon.gov.uk/sites/default/files/FINAL%20SA%20Report%20March%202017.pdf>

Further analysis does not seem to be available but was copied into the Beckley Neighbourhood Plan - SUSTAINABILITY APPRAISAL MATRICES ALTERNATIVE STRATEGIC ALLOCATIONS FROM SODC’S LOCAL EMERGING PLAN – WICK FARM AND LOWER ELSFIELD – Copied into Beckley’s Neighbourhood Plan – Appendix 10 P 32 -
<https://beckley-and-stowood-pc.gov.uk/sites/default/files/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20Evidence%20Base%20%20Appendix%204-10.pdf>

Strategic Housing and Economic Land Availability Assessment (SHELAA) (update - January 2019)

Site assessment from 2017 not updated in this more recent document. 2017 document -
http://www.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=880598959&CODE=B1D44A806056D4FE953DBA4706CECE3E

1006 - Land at Wick Farm and Lower Elsfield, Oxford (1) - ***“Unsuitable - not in accordance with emerging spatial strategy. 10% of site in Flood Zone 3b”***

1007 -Land at Wick Farm and Lower Elsfield, Oxford (2) – ***“Unsuitable - not in accordance with emerging spatial strategy. 28% of site in Flood Zone 3, 3% of the site is covered by Ancient Woodland and 3% of the site is covered by two SSSI. (One SSSI and one area of Ancient Woodland overlap but this has been taken”***

Heritage Impact Assessment – None for any of the new strategic sites around Oxford

Transport Across The Site And Effect On Existing Roads – Main document TRANS2 – Promoting Sustainable Transport p154 TRANS 4 – Transport Assessments p 158 TRANS 5 – Consideration of Development Proposals – p 159

Environment & Landscapes – ENV 1_ - Landscape and Countryside - p169, ENV 2- Biodiversity SSSIs p 171 ENV 4 Watercourses p 174 ENV 9 – Archaeology and Scheduled Monuments p 184, ENV 11 – Pollution p 187 ENV 12 – Pollution – Impact on Human Health p 188, EP 1 Air Quality, Health Impact Assessment P14 no detrimental effect on health of development!

p 189, **EP 4 - Flood Risk** p 192 and • **Strategic Flood Risk Assessment (December 2018) p66**
Bayswater Brook site has 3rd highest flood risk after Grenoble Road and Culham.

DES 1 – Enhancing Local Character p 199 see Beckley & Stowood Character Assessment Wick Farm p20 - <https://beckley-and-stowood-pc.gov.uk/sites/default/files/Beckley%20%26%20Stowood%20Neighbourhood%20Plan%20Evidence%20Base%20%20Appendix%204-10.pdf>

COSTS- Infrastructure Delivery Plan – costs for infrastructure will be considerably in excess of £92.5 million. This sum is likely to be a gross under estimate of the true costs, much of which the developer is supposed to meet. This does not include 50% low cost housing. Additional costs yet to be included are – a reasonable estimate of the proposed road, a foot bridge over the ring road, services – sewerage water, electricity, gas etc

There is no economic assessment available and it is questionable if it is viable.

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