

# SOUTH OXFORDSHIRE LOCAL PLAN 2034

## EXAMINATION IN PUBLIC

WRITTEN SUBMISSION TO EXAMINATION JUNE 2020

Mr John Walsh

### **Matter 5 Is the spatial strategy sound?**

#### **a. Is the plan's spatial strategy an appropriate strategy for meeting housing, employment, community and other needs in the right places whilst protecting the environment?**

The spatial strategy seeks to ensure additional housing is secured through the local plan.

The total requirement calculated is to meet the total housing need of Oxfordshire through the Growth Deal and unmet need for Oxford City. To the extent that some of the demand will be from people who wish to work in Oxford, they need to be able to get to work.

The sites chosen in the Oxford Green Belt to the east of Oxford are all about 4 miles by road to the city centre. The road system into Oxford is already pretty much at capacity, particularly during the a.m. and p.m. peaks, there are no plans to increase this capacity. It therefore makes sense to concentrate new housing development on sites that have rail access rather than road. This has not been considered. Thus making this part of the plan not positively prepared.

#### **b. Are the strategic allocations well-chosen and in the right locations?**

The process of selection ruled out any site as unsustainable if it was more than a few miles from the edge of Oxford City. An exception was made for Chalgrove Airfield because of pressure from the government and Homes England. This resulted in all other new site allocation developments being in the Green Belt, a policy completely at variance with the NPPF which states

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”

It is difficult to find sites that have good road connections to Oxford with spare rush-hour capacity, but there is good rail connection from Didcot and plenty of development already in the existing Core Strategy within walking distance of Didcot station. The unmet need of Oxford can be met by those developments and extra, non Green Belt sites identified across the district as a whole to make the total numbers calculated.

The exercise carried out in 2018 to look at sites anew after rejection of the original plan at council was flawed. The timetable set out left no possibility of a Schedule 18 consultation on new sites and it was no coincidence that all new sites were rejected so that the timetable could be met. This exercise

was extremely hurried and most of the paperwork was not available when the new plan went to scrutiny and was approved by the council. The original version of the plan which went through Schedule 18 and 19 consultations in 2016 and 2017 had sufficient houses to meet demands without further supplement, and the new sites, chosen without proper scrutiny or backup should be removed.

It is considered that the allocation of strategic sites fails the tests of soundness.

The new site allocations, following rejection at Council in 2018, are not justified as they have failed to take account of other reasonable alternatives, with a failure to follow schedule 18 consultations.

The proposal to inset sites from the Green Belt to enable housing numbers to be met is not consistent with national policy. The proposed site allocations will harm the Green Belt and the local authority has not demonstrated that it has examined fully all other reasonable options for meeting its identified need for development.