

SODC LOCAL PLAN 2034 – EXAMINATION IN PUBLIC

HEARING STATEMENT – Ginette Camps-Walsh

On behalf of

Beckley and Stowood Parish Council and Beckley and Stowood Neighbourhood Plan Steering Group

Matter 5. Is the spatial strategy sound?

Issue 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 sets out, amongst other matters, the strategy for providing new housing within the District. The approach taken is not considered compliant with Green Belt legislation and will fail to protect the environment. The Spatial Strategy seems to have been drawn up directly to oppose the Government's strategy to grant further protection to the Green Belt. It appears to be deliberately in direct conflict with the NPPF on the Green Belt in particular NPPF 136 and 137. It is also in conflict with its own stated objectives, particularly those of STRAT 1 The Overall Strategy "*Protecting and enhancing the countryside and significantly those areas within the two AONB and Oxford Green Belt*" and "*enhance our historic environment*". Its effect will be to do quite the reverse.

The Spatial Strategy by including areas "*next to the neighbouring major urban area of Oxford*" is considered inappropriate and non-compliant with Green Belt policy contained within the NPPF. The strategy sets out to destroy the Green Belt around Oxford. The strategy will be in direct conflict with the five purposes of the Green Belt Policy set out in the NPPF, all of which are particularly important around Oxford. It will also destroy, damage and threaten a number of important SSSI sites, important landscape and views, countryside, productive farm land and damage the environment.

The changed criteria for site assessment from the previous version of the Local Plan to the current one are considered unsound and unsafe. The criteria now appear to be –

- **The strategic site must be in the Green Belt** – of the 15 sites considered 6 out of 7 chosen were in the Green Belt with 100% of the new sites being in the Green Belt.
- **Must be near Oxford** – this is not the case and there is absolutely no evidence that houses need to be built on the edge of Oxford, destroying the Green Belt.
 - There is no substantiated requirement that co-operating to help meet Oxford's 'unmet' housing need is required near Oxford. Commuters do not have adequate access routes into Oxford from the east and south and no plans are in place to improve this. The only sustainable access is along existing railway lines into Oxford. The previous version of the Local Plan took the view that meeting Oxford's 'unmet' housing need could be achieved anywhere in the SODC area, as long as there were sufficient houses built. This is more realistic as the occupants of a house are very unlikely to work in the same place and will commute in different directions.
 - There is no guarantee that housing built near Oxford will house workers in Oxford, apart from social housing. It would be quicker to commute to High Wycombe or anywhere along the M40 from a proposed strategic site around Oxford than to

commute into Oxford itself. Please see the peak commuting times by road [bus] in Connecting Oxford ¹

- Witney to Headington 80 minutes -13 miles
- Abingdon to Oxford Science Park 60 minutes – 8 miles
- Summertown Oxford Business Park 50 minutes - 5 miles
- Buses from Thornhill Park and Ride to Oxford bus station according to Google and Traveline take approximately 30 minutes

(It is notable that Barton Park a new site adjacent to the strategic site of Land north of Bayswater Brook is being promoted to purchasers outside Oxford and advises journey times to people commuting to London and other destinations outside Oxford.)

- SODC’s original allocation of Oxford’s unmet housing is 4,950 over the planning period, so it is not necessary or even desirable to require all or indeed any strategic sites to be near Oxford
- As stated at the SODC Council meeting in Dec ‘18, one of the major criteria of the Spatial Strategy is that now **no strategic site is near Didcot or in any other ward represented by the SODC cabinet presiding at that time, in the previous administration**
- Can have a lower capacity of less than 1,500 houses – is this viable?
- **Are inconsistent with each other and change from site to site**
 - Must comply with the Plan’s Spatial Strategy, unless the site is in the Green Belt, in which case it is not required to meet this e.g. the non-Green Belt sites of –
 - Land north of Thame Road, North Weston
 - Palmer’s Riding Stables
 - Harrington – this was excluded due to non-compliance with spatial strategy, and environmental and infrastructure concerns. The latter two also apply to Land north of Bayswater Brook, which would also cause a high level of harm to the Green Belt, but is included as a strategic site (TOP 6.1 Strategic Site Selection Background Paper page 79)
 - The site must be in the Green Belt near Oxford (as previously discussed this is not the case) the following sites were rejected because of this requirement -
 - Palmer’s Riding Stables
 - Playhatch
 - Reading Golf Club
 - “Avoiding urban sprawl- coalescence of Didcot and villages” - this is one of the important functions of the Green Belt, but this damaging consequence is ignored in the cases of the strategic sites in the Green Belt around Oxford, but cited as a reason to reject a site near Didcot, which is not in the Green Belt –
 - Land south of Great Western Park, Didcot

¹ <https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/connectingoxfordshire.pdf> page 4

Protecting the Environment

There is no evidence that the spatial strategy makes any attempt to do this and in fact does the reverse.

- It puts a number of SSSIs at risk with no plans and little chance of mitigation
- The landscape around Oxford is to be destroyed and this is important for both current residents and as a green backdrop to Oxford and the near-by villages
- The concentration around Oxford will cause significant pollution concentrated near Oxford from cars and HGVs in particular, including dangerous particulate matter
- Developments themselves both during and after construction will produce significant quantities of greenhouse gases.

For these reasons it is considered that the selection of housing allocation sites within the local plan is unsound. The site selections have not been fully justified and are not consistent with National Policy.

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

TOP 6.1 Strategic Site Selection Background Paper which is the main supporting paper for choosing strategic sites is not dated and is completely flawed. It is out of date and the information contained in it is not consistent with Spatial Strategy of the latest version of the Local Plan 2034 (see Summary of outcomes page 74 onwards). The information and appraisal of the strategic sites, particularly the newer ones around Oxford is also flawed and should be disregarded. For instance, the Site Land north of Bayswater Brook has been considered as two sites – Lower Elsfield and Wick Farm and the Bayswater Farm site is completely missing and has not been appraised at all. It also states that it is for 3,000 homes and then goes on to contradict this and mentions 1,100 homes.

As discussed in the previous Issue the Spatial Strategy is unsafe and unsound and does not comply with the NPPF, particularly the Green Belt. The Green Belt functions are particularly important around Oxford City and to locate strategic sites in the Green Belt around Oxford will serve to do irreparable harm. It is considered that the strategic allocations will –

- to encourage the unrestricted sprawl of Oxford into the countryside
- to encourage neighbouring villages to merge into and be subsumed by Oxford and lose their individual and unique identities and directly harm existing residents
- to destroy the countryside around Oxford and encroach upon it making it unavailable for farming, habitats and recreational use
- to destroy the setting and special character of nearby villages with their unique heritage
- to discourage urban regeneration, by discouraging the recycling of derelict and other urban land and encourage hoarding of land for business in preference to housing

The Green Belt around Oxford is probably the most precious and the area with the highest need for its protection.

In addition, the new and potential strategic sites did not have sufficient or any Regulation 18 consultation. SODC also has its own requirement for consultation - South Oxfordshire Statement of Community Involvement Planning Service – June 2017. This states –

“5.2 Who we consult on planning policy

The Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the legal requirements for consultation and public participation in respect of local planning documents.

Local communities We will seek to engage with the local community through both our general consultation procedures and if appropriate, through targeted events, (e.g. public meetings, exhibitions and other forums). This is to ensure we capture representative views of the community.

We will work with those promoting development sites through the planning process to ensure that any site assembly is undertaken on a comprehensive basis and that those affected are aware of new planning proposals.”

It is understood that this failure to consult on new proposed strategic sites, was due to a limited time period following rejection of the original plan at council.

For these reasons the selection of strategic allocations within the local plan is not considered to be sound.

Neighbourhood Plans

The Site Selection Paper TOP 6.1. states that Neighbourhood Plans are considered, but these were not up to date and important ones have been ignored. The Beckley and Stowood Neighbourhood Plan went to pre-examination consultation in February 2018, but this was not even mentioned. Stanton St John’s Neighbourhood Plan is in development, but has been completely missed.

This failure to consider Neighbourhood Plans as part of the strategic site allocation selection process demonstrates that the Local Plan is not sound. The Local Plan has not been positively prepared through proposing objectively assessed development sites and is not justified as the strategic sites have not been properly considered against reasonable alternatives.