

The draft South Oxfordshire Local Plan is based on housing numbers significantly above identified local need and proposes major inroads into our Green Belt to accommodate them.

**If you are concerned about the future of our rural character, our market towns and villages, and the infrastructure and services needed to support them, please respond to the consultation.**

***Q: How do I respond?***

See the South Oxfordshire District Council (SODC) website for full details:

<http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2034>

You can fill in an online comment form, download a form to fill in and email or post it back, or attend one of their drop-in sessions. If you don't have access to the internet, you can call the SODC Planning Team on 01235 422600.

***Q: I responded before - do I need to respond again?***

YES! Only responses to this consultation round will be shared with the Planning Inspector, and you can only reply to the Inspector's future questions and issues, either in writing or at the public hearings (Examination in Public), if you put in a response now.

***Q: The District Council don't listen to my views - why should I bother?***

Responses to this consultation are also shared directly with the Planning Inspector, who has a duty to read and assess all comments. The Inspector's task is to help the Council arrive at a 'sound' Plan so the burden of proof does rest with objectors to prove change is needed. But if we don't share our views, we definitely won't affect the outcome!

***Q: The paperwork is ridiculous - where do I start?***

The Plan is a lot to read through but is written reasonably clearly. The response form can seem a bit daunting but please don't be put off. The attached sheet gives you some thoughts from CPRE Oxfordshire's point of view as to where the greatest concerns are and some points you may wish to raise - but we encourage you to put things into your own words and use examples personal to you and your community. The language doesn't need to be technical or complicated, but you should give good reasons why something should be changed, not just that you don't like it. (An Inspector will be looking to check that the Plan is legal, has been developed in co-operation with neighbouring Districts and statutory stakeholders, and is 'sound' - effective, justified, positively prepared and consistent with national policy.) See also the Guidance Note and video on the SODC website at the link above.

***Q: The final main question on the form asks about participating at the oral hearings - should I say yes or no?***

The oral hearings ('Examination in Public') will take place later in the year (date tbc) and give the Inspector a chance to ask further questions based on the issues raised. It is always helpful to have local residents and community groups represented - otherwise it can just be wall to wall developers! These sessions aren't by any means ferocious or aggressive - just a chance to talk through the evidence in more detail. So, if you feel you might be interested in taking part, we would definitely encourage you to tick 'yes' at this point - you can always change your mind later.

***Q: Where can I go for further information?***

[www.cpreoxon.org.uk](http://www.cpreoxon.org.uk)

[www.southoxon.gov.uk](http://www.southoxon.gov.uk)

**CPRE Oxfordshire - Summary Comments on South Oxfordshire Local Plan 2034 - Pre-Submission Consultation**

<b>STRAT 1</b>	<b>OVERALL STRATEGY</b>
Unsound - not justified, effective or consistent with national policy	
<p><b>Why?</b></p> <p>This Plan is unjustifiable in its scale and beyond the capacity of this mainly rural District to accommodate.</p> <p>The Plan calls for almost 30,000 houses to be built compared to the official Government forecast requirement of 10,000. That would be a 40% increase in SODC’s total housing stock in just sixteen years. It also implies 20,000 new households coming into the District between now and 2034, stretching its services and risking the coherence of its settlements.</p> <p>It would require a step change in building rate from 600 houses a year to 1,500 each and every year from now to 2034. This is undeliverable. However, opening up too many sites allows developers to prioritise the sites on which development would be most harmful and ignore those on which it is more acceptable.</p> <p>The extreme and unsustainable level of development proposed results not from any estimate of local needs but (as the Plan makes clear at Page 35) only from the Council’s perceived imperative to get the money promised by the Oxfordshire Housing &amp; Growth Deal. This involves £215 million from Government in return for a commitment to building 100,000 houses - translating as just £2,150 per house or to look at it another way £3,000 per unnecessary house (ie houses recognised by the Deal itself as being over and above recognised need).</p>	
<p><b>Modifications needed</b></p> <p>The District’s actual housing need is effectively met within the numbers in the already adopted 2026 Local Plan, so there is no urgent requirement for a new Plan now at all, or any apparent public benefit from producing one.</p>	

<b>STRAT 2</b>	<b>NEED FOR NEW DEVELOPMENT (includes Oxford’s ‘unmet’ need)</b>
Unsound - not positively prepared, justified, effective or consistent with national policy	
<p><b>Why?</b></p> <p>See response to STRAT 1 above.</p> <p>The most sustainable option for Oxford’s housing requirement is that it should be met within the City itself. Since Oxford’s own Local Plan has yet to be examined by a Planning Inspector, there is as yet no sound figure for any unmet need.</p> <p>If Oxford City prioritised land for housing, rather than employment, and built at densities appropriate to a City, it could accommodate as many as 26,000 houses which would be its full need as identified by the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA).</p> <p>What’s more, the new official Government need calculation, based on work by our own MP John Howell, shows that Oxford in fact needs only 15,000 houses, half the level the discredited SHMA forecast. This is backed up by a new update for the City, produced by the original SHMA authors GL Hearn, which also indicates that Oxford’s need has been substantially over-estimated, except as required to meet the Oxfordshire Growth Deal.</p>	
<p><b>Modifications needed</b></p> <p>See above.</p> <p>The allocation for Oxford’s ‘unmet need’ should be removed from the plan. This could be re-assessed</p>	

when Oxford City has developed and agreed its own plan.

<b>STRAT 5</b>	<b>RESIDENTIAL DENSITIES</b>
Sound	
Why? Land should be used as sparingly as possible to preserve the rural environment, maximize carbon storage and food production. This is not only National Policy (for example the Climate Change Act 2008) but is a basic tenet of sustainable development. The District already has a large stock of wasteful low density executive houses - the crying need is to balance the whole housing stock with lower cost smaller houses, at higher densities, maximizing use of expensive land. High density housing is not tower blocks. Jericho in Oxford is an example of very desirable high-density development. One-time farmworkers' housing in many villages is similar. This is typically 70 dwellings to the hectare or higher. Urban densities can be higher still. This policy is therefore welcome in principle, but could be modified further still to be yet more ambitious. It is also not clear that other policies within the Local Plan are consistent with this density policy. For example, many of the Green Belt sites appear set to deliver development well below what is proposed within this policy.	
Modifications needed Other policies in the Plan should be reviewed to ensure they are consistent with STRAT 5.	

<b>STRAT 6</b>	<b>GREEN BELT</b> <b>(also relates to the site specific policies: STRAT 8 &amp; 9 - Culham, STRAT 10 - Berinsfield, STRAT 11 - Grenoble Road, STRAT 12 - Northfield, STRAT 13 - Bayswater Brook, STRAT 14 - Wheatley)</b>
Unsound - not positively prepared, justified or consistent with national policy	
Why? The Plan calls for seven Green Belt sites to be developed, with all but one of the Strategic Allocations within the Green Belt and totalling over 11,000 houses (over 8,000 within the Plan period) or nearly 30% of the overall housing numbers. National planning policy requires Councils to release Green Belt for needed housing only after all other options have been explored and if no other land is available on which need could be met. All the Green Belt sites here fall at the first hurdle. If there is no housing need (see above) there can be no necessity. In any case no credible exceptional circumstances are suggested. The Kirkham 2015 Green Belt Assessment report concluded that all major parcels of the South Oxfordshire Green Belt fulfilled one or more of the five functions of the Green Belt. A 2015 survey commissioned by CPRE Oxfordshire, but undertaken by an independent research company, showed that the vast majority of Oxfordshire residents support the preservation of Oxford's Green Belt. Berinsfield is not justified... "wishing to correct the housing mix" (the justification offered) might require a little relaxation of the village envelope but can hardly justify releasing an area of land more than twice the size of the current settlement. Culham is not justified...it is open Green Belt land by the River and only a short distance from non-Green Belt land where houses could be built instead (if any at all were needed).	

SODC's 2015 report noted that Grenoble Road's openness - together with its high amenity value, evident to all who visit it - provided a strong sense of containment of the City. The Plan itself quotes SODC's own Strategic Sites Green Belt study as saying that the Grenoble Road development would be urban sprawl-preventing just such urban sprawl being of course the core purpose for which the Green Belt was created.

The same applies to Northfield and Bayswater Brook.

Wheatley Brookes site is previously developed land which can be redeveloped without removing it from the Green Belt - as argued by SODC's own officers at a Planning Committee in December. The proposed release to the East of Wheatley was deleted from the 2011 Plan by the Inspector as causing the coalescence of settlements.

**Modifications needed**

There are no exceptional circumstances to justify any of these incursions and any number of sound planning reasons why they should be struck out of the Plan.

<b>TRANS 1</b>	<b>OXFORD-CAMBRIDGE EXPRESSWAY</b>
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Unsound - not positively prepared, justified or effective.

**Why?**

Within the next two years, perhaps sooner, the decision is likely to be made on the new Oxford Cambridge Growth Corridor and well within the time scale of this plan work may have begun. It would consist of a new Expressway, bringing with it a development obligation of an estimated 10,000 houses a mile. Although it is glancingly mentioned in the Plan, the potential magnitude is not indicated, nor that the South Oxfordshire Green Belt seems to be the County Council's preferred target area, and very probably the National Infrastructure Commission's too. Not only would that mean a new ten mile "motorway" through presently open countryside South of Oxford, but the obligation to provide the 100,000 houses that go with it.

It is significant to the soundness of the plan because it would be far and away the most important event in the plan period, with the greatest impact, and, depending on its route, would not only impose a massive further housing target but also affect the site allocations that have been made in the Plan without (presumably) taking it into account.

It could potentially devastate the Green Belt South of Oxford and the open countryside and the villages within it - including Chalgrove, and Haseley/Harrington which would be likely targets for some of the 100,000 houses - and change the character of the area for ever.

**Modifications needed**

To be sound, the Plan needs to reveal as much as is known about the magnitude and routing of this new un-voted for growth plan, its potential impact on the area and the Plan itself, and the Council's intended approach.

<b>H4 &amp; Table 5f</b>	<b>HOUSING IN THE LARGER VILLAGES</b>
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Unsound - not justified or consistent with national policy

**Why?**

Para 5.25 states: 'The Local Plan's proposed strategy for housing distribution in the larger villages is for each settlement to grow proportionally by around 15% from the 2011 base date, plus any housing

allocated to that village through the Core Strategy.’

This includes a number of villages, such as Goring, Nettlebed and Woodcote, located within an Area of Outstanding Natural Beauty.

However, as established at the recent West Oxfordshire Local Plan examination, housing numbers within an Area of Outstanding Natural Beauty must be based on specific identification of local needs, not an arbitrary division of District wide needs.

#### Modifications needed

This section should be re-written to acknowledge the specific constraints of development within Areas of Outstanding Natural Beauty. Any scheme should convincingly demonstrate that it would give rise to benefits to the specific settlement or the sub-area (eg meeting identified local housing needs) and would clearly outweigh any likely harms (eg heritage, landscape, impact on local services).

<b>H16</b>	<b>INFILL DEVELOPMENT</b>
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Unsound - not justified or consistent with national policy

#### Why?

This policy should be capped per village as small but long and straggling villages could end up more than doubling in size.

The policy does not reference Neighbourhood Plans and as such, it appears that Infill sites could undermine the wishes of the local community (as has recently been the case at Chinnor).

#### Modifications needed

Infill in any one village should be capped at 5% of 2011 housing stock during the Plan period.

The policy should state clearly the relationship between infill development and neighbourhood plans.

Please note that this is just a summary of key concerns.

CPRE Oxfordshire’s full submission will be made available on our website in due course:

[www.cpreoxon.org.uk](http://www.cpreoxon.org.uk)

If you have views you wish us to take into account, we would be happy to hear from you.

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