

Part B – Please use a separate sheet for each representation

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

SOLP 2011-2034: STRAT 9 Culham; STRAT 11 Grenoble Road; STRAT 12 Northfield; STRAT 13 North of Bayswater Brook; Sustainability Appraisal 2018

Do you consider the Local Plan and supporting documents:

(1) are legally compliant

Yes

No

Don't know

(2) are sound

Yes

No

Don't know

(3) comply with the Duty to Cooperate

Yes

No

Don't know

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

The principal concern of the Oxford Green Belt Network (OGBN), which aims to represent the best interests of at least a majority of the Parish Councils within or partially within the Oxford Green Belt, is that the South Oxfordshire Local Plan 2011-2034 (SOLP 34) has been subject to far too many major changes in strategy and policy since the last publication version of the Local Plan 2011-2033 appeared for public consultation in October 2017.

These changes in overall strategy now require the removal of hundreds of hectares of land from the Green Belt for the building of several large strategic housing sites, and OGBN is very concerned that there has been insufficiently thorough investigation of alternative ways to provide the total amount of housing required in the new Plan which avoid using Green Belt land, and that some flawed reasoning is provided in the new Plan in an attempt to claim the existence of the “exceptional circumstances”, which are required in the NPPF before any land can be legitimately removed from the Green Belt when Local Plans are developed.

Unless “special circumstances” can be proven to exist for the removal of land from the Green Belt, four strategic housing sites STRAT9, STRAT11, STRAT12, and STRAT 13 are not clearly compliant with paragraphs 133-139 in the NPPF, and Policy STRAT6: Green Belt in the SOLP 34, and Objective 7.1 in SOLP 34, which aims to “protect and enhance the natural environment, including biodiversity, the landscape, green infrastructure and our waterways, placing particular importance on the value of the Oxford Green Belt, our two Areas of Outstanding Natural Beauty and the River Thames.” Although the Plan attempts to justify a basic methodology for selecting the preferred strategic sites for development and rejecting others, the site-specific detail which would normally be expected to underpin these site evaluations is not included in the Sustainability Appraisal 2018 accompanying SOLP 34, which appears to OGBN to be the result of a very superficial desk-top study of the strategic sites which has not drawn on the wealth of local information concerning the basic geography and the present infrastructure provision relevant to the development of

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these sites.

In signing up to the Oxfordshire Housing & Growth Deal, South Oxfordshire District Council (SODC) has agreed with 5 other adjacent authorities in Oxfordshire to provide 100,000 new houses in the County by 2031 in return for government funding of £215 millions to contribute to the cost of some of the housing and the required supporting infrastructure. The Oxfordshire Infrastructure Strategy (OxIS) reported in November 2017 that to provide sufficient supportive infrastructure in the County up to 2040 and beyond, a total investment of £9 billions would be required, so the Growth Deal's £215 millions will make only a very small contribution towards the cost of the infrastructure required, and unless other sources of funding are secured, some of the planned housing could be regarded as unsustainable, and the target of 100,000 homes found to be unattainable. Nevertheless, SODC is still able to increase its housing provision in SOLP 34 to a level above that indicate by the use of the standard method to arrive at the Objectively Assessed Need for housing in the District, but the increased housing provision cannot be used to justify any "exceptional circumstances" for removing land from the Green Belt to accommodate it in the District, since such a decision is purely a matter of choice. Furthermore the terms of the Growth Deal do not specify the geographical location where any of the extra housing should be built.

The claims by SODC that "exceptional circumstances" do exist for building in the Green Belt on these four strategic sites is flawed. It is claimed that the provision of housing in these four Green Belt locations is justified because it will deliver housing close to major employers, and the close proximity of centres of employment to the housing will allow sustainable means of transport to be used between the housing and the workplaces. However, there can be absolutely no guarantee of who will live in this housing and therefore where they will work, or what means of transport they may choose to use if their work is not with one of the nearby employers. For example at Culham, the great attraction of being able to live in beautiful countryside beside the River Thames is most likely to attract long distance commuters from as far away as London, just as much as people who will be able to find employment locally.

In the case of the three strategic housing sites proposed as edge urban extensions to Oxford City, primarily intended by SODC to meet some of Oxford's claimed unmet housing need, the special circumstances for taking these sites out of the Green Belt depend on there actually being a significant unmet housing need in Oxford City for people whose jobs are located within the city boundary. This still unproven.

OGBN believes that there is insufficient evidence available to justify the claimed size of Oxford City's unmet housing need of 1,400 dwellings per annum, and based upon transparent re-calculations of this unmet need in a recent report "**Review of the Oxfordshire SHMA 2014 and Oxford City SHMA Update 2018**" published in January 2019 by Opinion Research Services (ORS), an independent UK research organisation which has specialised in the calculations of housing need assessments for 140 other UK planning authorities, Oxford City's unmet housing need is only 776 dwellings per annum. The main reasons for such a large discrepancy between the Oxford City claimed unmet need of 1,400 dwellings per annum and the correctly calculated ORS figure of around half that, at 776 dwellings per annum, is that the Oxfordshire SHMA 2014 in error added an uplift of 79% for affordable housing to the OAN (85% when the backlog of need is also added) whereas the Oxford City SHMA Update 2018 proposes a 40% uplift, which is nevertheless much higher than has been proven to be needed for most other English local planning authorities to provide the appropriate number of affordable homes. The full ORS Review document is attached here to this response for fuller explanation of the reason for this reduction in the unmet housing need of Oxford City.

Before SODC can make any provision in its Local Plan 2034 for accommodating Oxford City's claimed unmet housing need, it needs to be assured that Oxford City Council has first followed national policy guidance in examining ***all reasonable alternative ways*** to accommodate all its housing needs within its own boundary, for example, in reducing the under-supply of housing by re-allocating for house building any land currently designated for new employment within the city boundary in its emerging Local Plan, and by building any new housing at higher densities of dwellings per hectare, more appropriate for a city, inside its own boundary. Only when an agreed figure for the City's unmet need can be confirmed, can SODC make provision for its share of it in South Oxfordshire. This confirmation will not be possible until the Oxford City Local Plan 2036 is approved by the Secretary of State, and until that occurs there can be no "exceptional circumstances" which could give the presumed benefit from locating these three urban extensions to Oxford close to the City boundary any priority over the strong policy intention expressed in the Plan, and in the NPPF, for permanently protecting land in the the Green Belt against inappropriate development.

There can therefore at present be no "exceptional circumstances" which can justify the removal of these strategic sites from the Green Belt.

(Continue on page 4 if necessary)

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

A revised South Oxfordshire Local Plan 2011-2034 should simply exclude any mention of STRAT9, STRAT11, STRAT12, and STRAT13.

Submitted by the Oxford Green Belt Network to SODC Planning Policy on 18.02.2019