

**GREAT HASELEY PARISH COUNCIL'S RESPONSE
TO
SOUTH OXFORDSHIRE DISTRICT COUNCIL'S
EMERGING LOCAL PLAN 2011-2033**

Great Haseley Parish Council considers that the Local Plan complies with the Duty to Cooperate. The Council does not consider the Plan to be legally compliant or sound for the following reasons:

1. The housing numbers are significantly in excess of the number required to meet the requirements of both the SHMA and the un-met need of Oxford City. This over provision is likely to get even larger when the revised SHMA criteria are confirmed by the Government.
2. Many policies depend upon infrastructure being provided by others – Highways, schools, public transport, medical facilities etc. – but the District Council has no powers to ensure that these happen in a timely manner, if at all as has been seen recently at the Great Western Park at Didcot.

The reliance on strategic sites brings this problem into sharp focus as failure to get the necessary infrastructure in place will effectively remove these sites from the Plan and could mean that the District finds itself without a five year land supply again.

3. Many of the Policies use phrasing that is too open in interpretation. The use of “....should....” in some and “....must...” in others has the effect, regardless of any dictionary definition, of making those Policies including ‘should’ as a nice to have option rather than a requirement.

Similarly, phrases such as “small scale”, “large scale”, “where appropriate”, “materially larger”, “significant”, “expected to ...” and “nearly” are all open to multiple interpretations and should be explicitly defined in each of the Policies that they refer to otherwise the planning process will be open to multiple appeals rather than being determined by the District Council.

4. Policy STRAT3 - This approach is unsound as it over supplies housing over the whole of the District but fails to make suitable provision for housing, particularly affordable housing, within easy reach of Oxford City and its employment opportunities. The proposed solution disperses people to remote rural locations, generally with poor transport links to the city, resulting in increased car journeys on already congested roads which is environmentally unsound. The Local Plan pays ‘lip service’ to addressing Oxford’s unmet need.

The Parish Council considers that if there is still a need to provide housing land to assist the City with its un-met need, it is logical that this provision should be located as close to the City as practical so as to keep communities together and it should not be scattered throughout the District. Placing town dwellers into the countryside is often a source of friction and they will miss the additional facilities that they have come to expect.

5. Policy STRAT 9 is seriously flawed. The site would be in conflict with proposed policies ENV11 as the necessary relocation of the runway will increase noise pollution to the occupants of Rofford Hall and Rofford Manor. It will also be in

conflict with the Proposed Policy ENV12 as proposed housing will be located close to an active airfield and ejector seat test facility.

Paragraph 7.5.37 of the Sustainability Analysis recognises ‘the potential for a minor negative effect is identified in relation to Chalgrove Airfield because of the potential for conflicts between the new community and relocation of Martin Baker’. This understates a major issue- a resident occupying a property at the Chalgrove site would be entitled to complain to the Council about the activities on the runway if they were thought to cause a nuisance, such a complaint could lead to a Statutory Nuisance Abatement Notice which would severely compromise or terminate the Martin Baker business. This would be of considerable concern to Martin Baker.

Chalgrove would not be a sustainable development as it would generate significant levels of commuter traffic with the associated carbon emissions and which would require very significant mitigating infrastructure (bypasses for Stadhampton, Little Milton, Watlington and Benson as well as junction improvements at M40 Junction 7, M40 Junction 6 and elsewhere). This is would be in addition to the £12million cost quoted by the HCA to relocate the runway.

6. Policy H9 – The viability question for affordable housing provision is very contentious. There needs to be an agreed National method at determining this, or the significant under supply of affordable housing will continue.
There is no detail on how the option of a financial contribution will result in affordable housing on another site.
7. Policy H11 – The bedroom size percentages for developments should be in the Policy itself rather than just in the accompanying narrative.
8. Policy H16 – For a site to be considered ‘infill’ it must front or at least have direct access to an Adopted Highway.
9. Policy H18 – To avoid the situation that has already happened in Great Haseley, it is essential that the wording of this Policy be changed to make it clear that the replacement building is at the same location as the building that it replaces and not hundreds of meters away, albeit still on land in the same ownership.
How much larger is ‘materially larger’? This too needs a definition.
10. Policy H20 – What happens if the business fails after permission is granted?
11. Policy EMP2 – This policy is in conflict with the Permitted Development Right to convert un-used offices into houses unless the Council make extensive use of Article 4 exemptions.
12. Policy INF1 – What happens when (not if) the proposed new infrastructure is not provided within the agreed timescale?
13. Policy TRANS 1, clause (v) - For many years, The District Council has consistently and vociferously opposed an addition river crossing at Reading for a number of reasons including the problems such a crossing would introduce to the transport infrastructure in the District and across its south eastern corner in particular. These arguments seem to have suddenly evaporated without any justification.
14. Policy TRANS 1, clause (ix) – by itself the new Thames crossing will not solve any problems with traffic simply move it to a new location. As the Parish Council stated

in its response to the Didcot Garden Town, the implication to all villages and junctions between the bridge and at least the M40 need to be considered as a whole.

15. Policy TRANS 3 – Little Milton has been on the verge of getting a by-pass for at least the last 30 years but there is no safeguarding allowance for this. It is not possible for two HGVs to pass in parts of the village and the two proposed Thames Crossings and the possible increase in Chalgrove employment land make a bypass even more urgent than it is already.
16. Policy TRANS 5, Clause (vi) – Who determines when these are required and what sanctions are available to the Council if they are not provided when required?
17. Policy TRANS 5 Clause (xii) – charging points for electric and hybrid vehicles should be a requirement for all new homes with private parking and for communal parking spaces.
18. Policy TRANS 7 – The criteria for ‘significant increases’ should be spelled out and there needs to be recognition of environmental weight limit restrictions so that these do not become a farce.
19. Policy INF2 – There must be a minimum service broadband speed included as a requirement for all new developments and provision must include, at least ducting etc, for Fibre to Premises.
20. Policy ENV5 – The contribution to Green Infrastructure must be made a requirement not just a wish.
21. Policy ENV8 – These requirements should not be just an expectation.
22. Policy ENV12 – There should be noise generation limits for new industrial premises and from, for example, air conditioning or heat pump units and ventilation plant.
23. Policy EP3 – These requirements should not be just an expectation.
24. Policy DES1 – The objectives laid out in this policy are very laudable but there should be some specific criteria set out to cover target values for energy use, air tightness, secured-by-design, SUDS etc.
25. Policy DES3 – Where is it set out which applications requires a Design and Access statement?
26. Policy DES9 – Reference to the Design Guide should be included in the Policy not just in the accompanying narrative.
27. Policy DES9 – This policy should be setting actual standards and limits if not covered elsewhere. The Council should, for example, be looking to get developments to exceed the requirement in Part L of the Building Regulations, including BREEAM Excellent for non-domestic development, etc.
28. Policy CF1 - This policy should be amended to specify that an Asset of Community Value listing status (described in Page 183 Para. 11.6) should be a Material Consideration for planning applications in accordance with the 2014-15 House of Commons, Communities and Local Government Committee recommendation.