

Great Haseley Parish Council

Response from Great Haseley Parish Council to South Oxfordshire District Council's Local Plan 2032 Preferred Options consultation.

Question 1 - *Is this the correct strategy to deliver the objectives for our district to 2032?*

No – While Great Haseley Parish Council agrees with the objectives, it believes that the draft SODC Local Plan 2032 is flawed in selection of Chalgrove Airfield as the Strategic Site for new housing due to the many very significant disadvantages of that site. Harrington would also be a totally unacceptable option, with even greater disadvantages.

Both the Chalgrove Airfield and Harrington Developments are contrary to many of the Strategic Objectives; in particular:

- OBJ 1.2** - The addition of thousands of houses in one of the most rural areas of the District, runs totally contrary to the stated objective of supporting rural communities and recognizing what attracts people to the District.
- OBJ 1.4** - Locating a strategic allocation site at either Chalgrove or Harrington does not support the stated objective of focusing growth in the District in the 'Science Vale'.
- OBJ 3.3** - Locating any large scale development in open countryside, remote from Oxford City and the 'Science Vale' will not provide housing growth that will facilitate sustainable journeys to work.
- OBJ 3.5** - Neither Chalgrove nor Harrington are located in any of the eight zones shown in The Strategic Economic Plan for Oxfordshire (SEP) as employment growth areas.
- OBJ 4.2** - A strategic development in open countryside will never provide developments that are able to provide the conditions that will make public transport a viable choice.
- OBJ 5.2** - Building thousands of houses in open country side cannot be said to respect the scale and character of towns and villages or the special character of our historic settlements and the surrounding countryside.
- OBJ 7.2** - Locating a strategic allocation site at either Chalgrove or Harrington will do nothing to conserve and enhance the rich and varied historic assets or their setting. During the construction of the M40 near Junction 7, an Iron Age settlement was excavated and Chalgrove airfield covers a civil war battlefield.
- OBJ 8.1** - Developments in open country side will do nothing to reduce carbon emissions and will increase air, noise and light pollution; they will also increase the potential for flooding and water pollution.

The Parish Council would also point out that development at either location would fundamentally conflict with SODC's Vision set out in paragraph 3.3 of the Preferred Options consultation document:

"South Oxfordshire will remain a beautiful and prosperous place to live and it will be an attractive place for people to work and spend their leisure time"

It is the Parish Council's view that either development would seriously damage the surrounding area and would significantly reduce the attractiveness of the area as a place to live both for existing residents and future generations.

The Sustainability Analysis indicates that the Green Belt sites adjacent to Oxford offer significantly greater environmental and economic advantages and fewer disadvantages than either Chalgrove or Harrington sites. Despite this, none of these sites were given detailed consideration in the selection of the Strategic Site, solely because they are within the Green Belt.

The Sustainability Assessment for all 7, not just 2 should have been summarized in the main 'Refined Options' document because few people will have found this information on the other 5 sites on the website and this will have skewed the consultation.

"Green Belt' does not assess the value of land by its quality, the value of productive agricultural greenfield land has not been considered and Harrington, located in an area once designated by SODC as an Area of Great landscape Value (until this category was later removed from the Local Plan) in particular any development here would be an appalling, light polluting eyesore on a picturesque landscape that that has remained pretty much unchanged for centuries. This area on the Oxford Plain is highly visible from the Chiltern Hills AONB and from the M40, the main artery from London approaching Oxford - it would surely be highly detrimental for Oxford County and the City to despoil what is surely one of the great views of England and potentially damaging to the tourist industry.

The test of 'exceptional circumstances' has not been properly considered for any of the 5 sites – for example, the regeneration aspect around Blackbird Leys that would arise in the example of the Grenoble Road (although SODC are happy to apply that argument for Berinsfield), for the Culham site, with the strategic and economic importance of the Science Vale set out by Oxleap and sitting in the "Oxfordshire Knowledge Spine'.

Question 2 - *Are there any improvements that you can suggest for the strategy?*

Yes - No consideration has been given in the 2032 Development Plan to the significant advantages of Green Belt sites versus Chalgrove and Harrington. A number of these sites are significantly better placed to achieve the objectives of SODC specifically related to sustainability, settlements, infrastructure and community.

There are a number of Councils who have released Green Belt for development, under 'Exceptional Circumstances', some on the basis of economic growth. There are also proposals included in Government Planning Policy consultation to release small sites in the Green Belt for 'starter homes'. Earlier this year the Secretary of State for Communities and Local Government decided that 1500 new homes could be built on Green Belt land between Gloucester and Cheltenham. We would urge SODC to adopt a similarly balanced approach to assessing suitable 'Strategic Sites' and recognise the environmental and economic benefits that create the "Exceptional Circumstances" under which Green Belt alternatives should be considered. The Green Belt as it stands is constraining Oxford City too severely, contributing to its underperformance as not reaching its full potential as assessed in "The City Deal'

The significant number of houses required to be built by SODC due to Oxford City's unmet housing need – clearly means proximity to Oxford must be considered even if it means impinging upon the Green Belt. The location should be adjacent to employment and give due consideration to infrastructure to new communities. There is a precedent for breaches of the Green Belt around Oxford and this is even recommended elsewhere in the consultation documents for sites at Culham, Wheatley and Berinsfield.

The NPPF policy framework states that 'when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of

development'. Neither Chalgrove Airfield nor Harrington can be considered 'sustainable' due to their distance from significant employment and lack of rail and other public transport links and the level of major infrastructure that would be required to make either site viable.

SODC should consider the possibility of a number of smaller developments rather than one major one, which would result in improved deliverability (as shown by Didcot) and any New Town is likely to be long in the planning so unlikely to be able to secure delivery of a 5 year land supply. A number of smaller developments would better reflect the views of the 2015 consultation respondents who stated a 'Strategic Allocation' was virtually their least favoured option out of the 8 presented and heavily outweighed the positive comments many of which provisos concerning the need for massive investment in transport and infrastructure.

The Parish Council is surprised and concerned that the Harrington site has even been included at this stage. Back in 1988, SODC was totally opposed to a new town on virtually the same site – known as Stone Bassett – and working with and financially supported by local Parish Councils, SODC successfully won the resulting planning appeal. The arguments that were successfully used then are still valid; the site sits in the gap between the Chiltern' AONB and the City of Oxford on high quality agricultural land and would be visible from the Chilterns, especially at night.

Question 3 - *Do you agree with the overall level of housing provision proposed?*

No - The SHMA was carried out in 2012. This makes it four years out of date and so its validity is questionable at best.

In addition the economic outlook has changed fundamentally since the Brexit vote.

The provision of 3,700 house to cover Oxford's unmet need – why has SODC, in conjunction with the rest of the counties local authorities not pursued more aggressively the findings of the Cundall Report to force Oxford to re-assess, and find room for more housing within the city boundary.

Question 4 - *Do you agree with the proposed distribution of housing around the district?*

No

Question 5 - *Do you agree with our choice of Chalgrove Airfield as the preferred Strategic Allocation and if not, what changes do you suggest?*

No – Great Haseley Parish Council does not agree with SODC's choice of Chalgrove as their preferred 'Strategic Allocation' site and, further they do not consider Harrington to be a viable alternative. Either of these locations would be an unsustainable site for a new town. Both score poorly in terms of sustainability in the Sustainability Appendices and would:

- Lead to a large increase in vehicle movement
- Place a drain upon existing infrastructure with huge pressure on existing communities
- Reduce tranquillity and have significant heritage constraints

Both of these sites are a significantly greater distance from the likely major sites of employment than any of the Green Belt sites, with poor public transport and cycling impractical. Even with significant improvement to the road network, the rush hour commute time from a development on that site will still be very significant, making the site quite unattractive to people working in the Science Vale or

Oxford. The drive times stated in the document are totally unrealistic, even for off peak travelling and woefully inaccurate for peak commuter travel. Additionally, if 40% of the housing is to be affordable housing it is difficult to see how their residents will be able to afford the high cost in both time and cash of getting to the major employment sites such as the hospitals and retail centre of Oxford and Science Vale.

Even if substantial improvements to the local road network serving Chalgrove were made, the major increase in road traffic would require massive investment in additional roads to improve access to the M40 and along the A329. Any new link to the M40 will necessarily cut across open countryside causing further damage to the area and increasing noise and light pollution.

The cost of providing the necessary infrastructure would be immense and not sustainable. Who will pay for the infrastructure? Infrastructure was one of the main issues highlighted by respondents to the previous consultation. The sites closer to Oxford do not have such extensive issues, for example existing bus and cycling routes, plus in some cases rail links that can be upgraded. Indeed, the Chalgrove & Harrington locations will require more than double the infrastructure compared to those sites closer to Oxford as they will need infrastructure in the vicinity of the development, more enroute to Oxford & the M40 and yet more on the outskirts of Oxford.

If the substantial investment was made to provide the necessary road links for Chalgrove or Harrington – a consequence would be that the Science Vale for example would be starved of the funds needed to support its economic aspirations

It is understood that traffic movements around Chalgrove have been under study during the consultation period. Any study during the peak summer/school holiday period will give a distorted picture of the traffic situation.

There is a clear opportunity to work in partnership with Oxford City Council to develop an aligned approach that serves the overspill needs of the City with housing adjacent to need.

Any large scale development at either Chalgrove or Harrington will not encourage integration of the residents with the local communities. In the case of Chalgrove, the B480 will act as both a real and psychological barrier to integration with the existing community of Chalgrove and in the case of Harrington; there is no effective community for them to integrate with.

Clearly neither option supports the Employment and Economy Strategy as they are away from the key area of the Science Vale and Oxleyp's Knowledge spine or The Strategic Economic Plan for Oxford which clearly states that the areas on which development should be focussed are virtually everywhere in Oxfordshire EXCEPT the proposed sites, as shown on their map which

"Illustrates Oxfordshire's committed main housing and growth, and the transport infrastructure proposals proposed to support that growth, on Oxfordshire's eight main corridors/areas".

Question 6 - *Do you agree with our preferred approach, whereby the allocation of most housing sites will be undertaken through Neighbourhood Plans for the towns and villages?*

No – There is opportunity for some additional housing provision through neighbourhood plans, however this preferred approach is undermined by the Development Plan's heavy reliance upon Strategic Sites.

Question 7 - *Do you agree with a proposed approach for the Oxford Brookes Wheatley Campus? If not, what changes do you suggest?*

Yes

Question 8 - *Do you agree with our proposed approach towards the provision of affordable housing, particularly the percentage proposed and the proportional tenure split between social rented and intermediate housing and the requirement to provide on-site?*

Yes

Question 9 - *Do you agree with our preferred amount and distribution of new employment land? If not, what changes do you suggest?*

Yes – The Parish Council has concerns that if care is not taken, too much employment land, particularly in the wrong places, will increase pressure on housing requirements.

Question 10 - *Do you agree with our preferred transport strategy? If not, what changes do you suggest?*

No – The transport strategy is contradicted in the Plan. By including the recommendation for a ‘Strategic Site’ (Harrington and Chalgrove) the consultation document ignores the fact that this would create a new dormitory town, almost totally reliant on car usage for all commuting and most other journeys.

It is also the case that either development would fail to meet a number of the elements of SODC’s transportation Strategy, including:

- Ensure that, as far as possible, new development is located close to, or along, existing strategic public transportation corridors, where bus and/or rail services can then be strengthened in response to increases in demand for travel.
- Ensure that new development is designed to encourage walking and cycling, not only within the development, but also to nearby facilities, employment and public transportation hubs.

Given this, either development would undermine the delivery of “Low Carbon Oxford”, which includes a commitment to reduce carbon emissions by 40% by 2020.

While the Parish Council accepts the argument that the need for a ‘strategic allocation site’ is not directly linked to the proportion of Oxford City’s unmet need that SODC is required to make allowance for, the closeness of the numbers make such a linkage inevitable. It is also inevitable that any of ‘strategic allocation’ sites will effectively become part of the City’s overspill. Given this, proposing Harrington and Chalgrove as alternative sites is illogical given that they are the 2 options furthest from Oxford at 11 and 13 miles respectively. There is no existing public transport option for either location and hence they do not meet the “sustainable transport” test applied.

The impact of Chalgrove or Harrington would be to create car based commuters settlements, which are not sustainable and the infrastructure spend on road improvements over the distances involved would be immense and potentially very destructive of the countryside and nearby villages.

The pressure on the small local roads in the vicinity of the sites many of which are single track or have stretches of single track road, will be highly damaging as they will be used as rat-runs to try and avoid traffic delays. Tractors and other large agricultural machinery use roads in this rural area extensively and a significant increase in traffic would result in a disproportional increase in the accident risk and destruction of the verges important for biodiversity.

Question 11 - *Do you agree with our proposed approach towards the provision of infrastructure? If not, what changes do you suggest?*

Yes – Great Haseley Parish Council broadly agrees with the proposed approach to the provision of Infrastructure but believe that Policies and procedures need to be put in place to ensure that developments should not be allowed to go ahead without properly timed and funded infrastructure requirement being assessed and implemented PRIOR to initial occupation of the development.

Question 12 - *Do you agree with our approach towards retailing – the strategy and the amount of floor space to be provided? If not, what changes would you suggest?*

Yes – The development of either Harrington or Chalgrove will have an adverse effect on the existing and proposed retailers in the area, particularly, Thame, Watlington and Wallingford. The inevitable retail development that would be included in either of these sites would distort the long established balance of market towns and village shops that has built up over time and still works to everyone's benefit.

Question 13 - *Do you agree with our approach towards retailing in Henley, Thame and Wallingford, which will be delivered by Neighbourhood Plans?*

Yes

Question 14 - *Do you agree that no further housing should be allocated to Didcot, given the amount of housing land that is already committed?*

No – Great Haseley Parish Council believes that if there is a need for additional housing at Didcot to support local Didcot area based employers then more houses should be built at Didcot.

Question 15 - *Do you agree with our proposed approach to redevelopment at Culham Science Centre and the No.1 site? If not, what changes would you suggest?*

Yes – Any development around these sites must include sufficient additional housing to support the employment opportunities at these sites.

Question 16 - *Do you agree with our proposed approach towards the regeneration of Berinsfield? If not, what changes would you suggest?*

Yes

Question 17 - *Do you agree with our strategies for Henley, Thame and Wallingford?*

Yes

Question 18 - *Should we allocate additional housing land in Henley?*

Yes

Question 19 - *Do you agree with the level of new housing provision proposed for Thame and Wallingford?*

Yes

Question 20 - *Do you agree with the level of new employment land proposed for Thame and Wallingford?*

Yes

Question 21 - *Do you agree with the level of housing proposed for the rural area and its distribution between the Larger and Smaller Villages?*

Yes

Question 23 - *Do you agree with our proposed Contingency Policy to ensure delivery of housing? If not, what changes to you suggest?*

No – Great Haseley Parish Council does not agree with the approach of building contingency into the allocation of housing need. This policy is encouraging SODC to consider locations and sites that will create approval for more housing than will be required. Specifically the “contingency model” is driving the agenda for larger ‘Strategic Sites’ rather than the need for appropriate mix of housing in the best locations adjacent to need.

There is also the recent housing that has been granted planning permission on appeal in Chinnor and Stadhampton and these should be taken into account