

# Save our Sandhills Green Belt

## Completing the SODC Representation Form

Forms need to be returned by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)

### 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:

**Policy STRAT 13: Land North of Bayswater Brook**

Do you consider the Local Plan and supporting documents:

(1) are legally compliant	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
(2) are sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>
(3) comply with the Duty to Cooperate	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't know <input type="checkbox"/>

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.

**You are free to make any comments you like in this section and it's important to express how the loss of this land will affect you personally. However, we have been advised that the Planning Inspector will give more weight to comments that are related to the 3 technical issues below.**

Suggestions for your comments include: (1) walking and running in this area, (2) the quiet roads, (3) access to the green space, (4) the views, (5) children using the bridle path to walk to school, (6) effect on wildlife, (7) your concerns about traffic and Sandhills becoming a rat run from Bayswater Road, (8) increased noise and air pollution, (9) loss of Green Belt and disruption of bridle path, (10) forever changing the character of Sandhills.

### THE LOCAL PLAN IS NOT LEGALLY COMPLIANT:

- **Local Development scheme & timetable:** The LDS relevant to LP 2034 is not publicly available – only version on SODC's website refers only to the LP 2033. This is not compliant with NPPF guidelines. Furthermore Bayswater Farm (BF) was added to the Local Plan late in 2018 and did not have a site-specific assessment during the planning stage.
- **Consultation:**
  - **Residents have not been informed or consulted about the plan**, including types & density of housing.
  - Vital questions have not been addressed to the City Council, e.g. opening of the cul de sacs at Burdell and Delbush Avenues.
  - Due to the late addition of BF to the Local Plan, **this site has not been through section 18 consultation.**
  - **No consultation has taken place** with the Sandhills parish council or residents before the plan was published on 7th January. This is non-compliant with the SODC's own Statement of Community Involvement (June 2017): "We wish to ensure that people are involved at the early stage of Local Plan preparation and in the consideration of planning applications. We want people to feel that they can make a real difference to the future of the areas in which they live and work."

- **National Policy & Legislation:**

- The building of 160-200 houses at BF represents a **60% increase in housing**. This goes against the NPPF (National Planning Policy Framework)
- The 3 reasons used by SODC for releasing Bayswater Farm from the Green Belt are flawed:
  1. **Proximity to Oxford offers ‘a high potential for travel by walking and cycling’.** The SODC’s own transport consultants say that “the A40 is a major physical barrier to connectivity, particularly in terms of walking and cycling.’ BF is further on the outskirts than the rest of LNBB. Hence it’s potential must be judged similar to the rejected Thornhill site – see below.
  2. **Potential to connect to the city’s public transport system.** The Oxford City Council report, “Evaluation of Transport Impacts January 2019”, shows that only 27% of journeys in South Oxfordshire are made by public transport or walking/cycling. A proposed release from the Green Belt for a development at Thornhill was rejected by the Council, although it has closer proximity to public transport than Sandhills.
  3. **Building on BF is part of Oxford’s unmet housing need strategy** – not required, see below.

## THE LOCAL PLAN IS NOT SOUND

- **It is not Positively Prepared:** No adequate flood risk assessment has been carried out for Bayswater Farm. The Local Plan states “More evidence on ecology is required”. Also “appropriate detailed landscape, visual & heritage impact assessments must still be provided”.
- **Meeting the housing needs:** The Strategic Housing Market Assessment (SHMA) calculations for housing needs in Oxford are 22,775 new homes. The Local Plan includes 28,465 new homes, hence housing at Bayswater Farm is not required.
- **Infrastructure:** There are no traffic solutions offered – only suggestions such as “a new road connecting to the A40” or “significant enhancements to junctions”, e.g. the “Thornhill Park & Ride Junction”. An Oxford City Council study estimates 250+ vehicles on Sandhill’s roads at peak times due to the Bayswater Field site alone. However, thousands of cars could come through if Sandhills is connected to LNBB.

**It is not justified:** The development at Bayswater Farm is not required to meet the unmet housing needs of Oxford City; it would remove the only local amenity that Sandhills currently has – the green space which is vital for the well-being and health of residents.

## THE LOCAL PLAN DOES NOT COMPLY WITH THE DUTY TO CO-OPERATE

As set out in SODC's Statement Of Community Involvement they pledge to Cooperate with neighbouring local authorities such as Oxford city council. This has not taken place - this section of the LP should not be adopted.

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.

- **Remove Bayswater Field from the proposed LNBB plan.**
  - If it is to be considered it must be assessed as a stand-alone site. A separate timetable and Local Development Scheme must be presented. A full consultation has to be conducted and adherence to National Policies & Legislation has to be made transparent, including the reasons for its removal from the Greenbelt. Furthermore, the plan has to be presented in a sound manner, positively prepared with all assessment results available. A justification provided for the housing need and clear plans presented how the infrastructure might be affected and which plans are in place to mitigate such risks.

**Stay connected with the Save Our Sandhills Green Belt community:**



**WEBSITE:** <http://sandhills.estate/>