

**The Bensington Society Responses to the
SODC Pre-submission Draft Local Plan 2034**

Policy STRAT 1 – Overall Strategy

Policy STRAT 5 – Residential Densities

The Plan is hardly justifiable in scale and probably beyond the capacity of SODC to deliver, calling as it does for almost 30,000 houses to be built against the Government forecast requirement of 10,000.

Over the plan period it would mean building circa 20,000 new houses in the District between now and 2034 (1,500/year) and it is not clear how infrastructure could be raised to meet that number.

The unsustainable level of proposed development appears not to be based on estimated local needs but, as the Plan makes clear at Page 35, SODC have a perceived interest in obtaining the money promised by the Oxfordshire Housing & Growth Deal, which involves the Government providing £215 million in return for a commitment to building 100,000 houses.

Modifications needed:

The District's adopted 2016 Plan identifies the actual housing need, so there is no urgent requirement for a new Plan now at all, nor is there any obvious public benefit from producing one.

Policy STRAT 6 – Green Belt

The Plan identifies seven Green Belt sites for development with all but one of the Strategic Allocations within the Green Belt.

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 the need could be met. The Green Belt sites identified here all fall outside of National planning policy and should thus be removed from the Plan as there are no 'exceptional circumstances' to justify their inclusion in it.

TRANS 1 – Oxford-Cambridge Expressway

Land should be used as sparingly as possible to preserve the rural environment and maximize carbon storage - a basic tenet of sustainable development. Typically, it would be 70 dwellings to the hectare and urban densities could be higher still.

It is not clear that other policies within the Local Plan are consistent with this density policy e.g. many green belt sites appear to set densities well below that proposed by this policy.

Unsound plan that appears to be poorly prepared, unjustified or effective. It is based on decisions beyond the SODC remit and much of the route has yet to be agreed.

The Cambridge Growth Corridor, well within the time scale of this plan, brings with it a development obligation of an estimated 10,000 houses a mile. This is hardly mentioned in the plan, nor is its potential magnitude indicated.

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, not least because of the potential impact on the Oxfordshire Green Belt.

H5 and Table 5F

This is not justified nor consistent with national policy. 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 villages such as Goring, Nettlebed and Woodcote which are located within an Area of Outstanding Natural Beauty.

The recent West Oxfordshire Local Plan examination states that housing numbers within an Area of Outstanding Natural Beauty must be based on the specific identification of local needs, not a division of District wide needs.

This section should be re-written to acknowledge the specific constraints of development within Areas of Outstanding Natural Beauty and convincingly demonstrate that such development would give rise to benefits to the specific settlements (eg: meeting identified local housing needs) and clearly outweigh any likely damage (eg: heritage, landscape, impact on local services).

H16 – Infill Development

There should be a stated limit of new houses - particularly for small, linear existing villages that might otherwise end up doubling in size.

It is disturbing that this policy does not make specific referral to adopted Neighbourhood Plans, which can result (eg: Chinor) where the wishes of the community have been undermined.

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