



South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

18 February 2019

Dear Sir/Madam,

Please find attached Homes England's representation to the South Oxfordshire Local Plan 2034, made in its capacity as promoter/landowner of Chalgrove Airfield. A separate response has been provided by Homes England in its capacity as the Government's Housing Delivery Agency, ensuring more people have access to better homes in the right places.

Homes England's role is to work collaboratively with partners to unlock land to ensure more people in England have access to better homes in the right places. It is clear that South Oxfordshire District Council is making housing a priority and Homes England is fully supportive of the spatial strategy to achieve this.

Through the use of surplus public sector land Homes England is in a position to deliver a 21st Century Market Town at Chalgrove Airfield to bring forward the delivery of a new sustainable community with at least 3,000 homes and associated infrastructure to help meet the identified housing need over the plan period. Chalgrove Airfield is a public sector site which was declared surplus to requirements by the MOD and transferred to Homes England in July 2016.

Since this time Homes England has been working collaboratively with the South Oxfordshire District Council, Oxfordshire County Council, surrounding parish councils, other stakeholders and the local community to identify the best use of this site through the development of a detailed masterplan including an appropriate package of on and off site infrastructure to support development of the site.

Through this engagement, Homes England has developed a deliverable masterplan that will ensure the Chalgrove Airfield is:

- **A connected place** that is independent and sustainable, with access to world leading businesses and 21st century technology, providing family homes, housing for the elderly, affordable housing for young people and key workers. Accessible local shops, leisure and cultural facilities would be provided as part of the proposed development alongside the space, infrastructure and support to set up local businesses. The development would have

connections to Science Vale and the world's best universities, Science Parks and Innovation Centres;

- **A distinctive place** that reflects the character of South Oxfordshire and meets its 21st century housing, health and environmental challenges. A traditional market square with modern schools and health facilities would form the focal point at the heart of the community. Publicly accessible open space forming a comprehensive network of green spaces would celebrate historic routes and provide views of hills, church spires and manor houses;
- **A vibrant place** with the community spirit of a village and the facilities of a 21st Century Market Town. The secondary school, sports clubs and cultural facilities provide activities for residents and reduce the need to travel. Parks, green lanes and a network of cycle friendly streets create safe places for leisure and recreation and links to the wider countryside.

The considerable work undertaken since the sites transfer to Homes England is detailed in the attached representation which demonstrates that the decision of SODC to allocate the site is sound and that the site will contribute positively towards the spatial strategy and meeting South Oxfordshire's housing need over the plan period.

It is Homes England's intention to continue to work with SODC, OCC and other partners to bring forward the site at the earliest opportunity.

Yours faithfully,



Ken Glendinning
Head of Strategic Land
Homes England

South Oxfordshire Local Plan 2034

Publication Version

Representation Form

Please return 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

This form has two parts:

Part A – contact details

Part B – your comments / participation at oral examination

Part A

Are you responding as an: (please tick)

Agent

Business or organisation

Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

	1. Personal Details	2. Agent Details (if applicable)
Title	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
Full Name	<input type="text" value="Ken Glendinning"/>	<input type="text" value="Nick Taylor"/>
Job Title (where relevant)	<input type="text" value="Head of Strategic Land"/>	<input type="text" value="Partner"/>
Organisation (where relevant)	<input type="text" value="Homes England"/>	<input type="text" value="Carter Jonas"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="One Chapel Place"/>
Address Line 2	<input type="text"/>	<input type="text" value="London"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text" value="W1G 0BG"/>
Telephone Number	<input type="text" value="C/O Agent"/>	<input type="text" value="020 7518 3200"/>
Email Address	<input type="text" value="C/O Agent"/>	<input type="text" value="nick.taylor@carterjonas.co.uk"/>

Part B – Please use a separate sheet for each representation

Document / Policy / Paragraph:

STRAT7: Land at Chalgrove Airfield

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.

Homes England considers that the policy is sound, legally compliant and in general conformity with the provisions found within the NPPF.

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.

Homes England supports the strategic allocation at Chalgrove Airfield. The strategic allocation at Chalgrove Airfield presents an unrivalled opportunity to support the overarching spatial strategy of the Local Plan through the delivery of a sustainable, large scale development located within the heart of the district, that is well placed to respond to the urgent and significant need to increase housing supply in order to meet the well evidenced housing need and strategic employment objectives in South Oxfordshire and wider area set out in STRAT1 'The Overall Strategy' and Policy H1 'Delivering New Homes'; as well as the high level of residential delivery over the plan period is commended.

STRAT7 'Land at Chalgrove Airfield' and the proposals developed by Homes England support other policies within the Plan, including STRAT4 'Strategic Development' which encourages a comprehensive framework of the highest quality strategic developments within South Oxfordshire.

The soundness of the Local Plan is underpinned by the inclusion of Chalgrove as a strategic allocation, which in itself is a fully justified and robustly tested strategic allocation, as detailed in the SODC site assessment paper. The response below demonstrates that the site is suitable, available and deliverable.

Chalgrove Airfield is Justified – it is a suitable and sustainable location for a strategic allocation which is consistent with national policy

The suitability of Chalgrove as a strategic allocation has been robustly tested, on an iterative basis throughout the preparation of the Local Plan. The SODC site assessment paper confirms that there are no absolute constraints that would prevent the site from being developed; that Chalgrove performs well against the range of assessment criteria; or where the site performs less well, the potential impacts can be appropriately mitigated.

It is considered that Chalgrove Airfield has a critical role in ensuring SODC deliver the overarching Spatial strategy. While not directly contributing to the targeted and prioritised investment in the Science Vale, the Chalgrove allocation provides a complimentary and critical role that supports the wider objectives of the Local Plan in as much as:

- It will deliver approximately 3,000 new homes with a diverse mix of housing types with the potential to meet approximately 13% of SODC's housing need over the Plan period (meeting and exceeding the requirements of Policy H1 'Delivering New Homes');
- A fully policy compliant scheme with the ability to deliver 40% (1200) affordable housing and a diverse mix of housing types (compliant with H9 'Affordable Housing' and H11 'Residential Mix');
- It has unrivalled opportunity for job creation – both onsite and through supporting the expansion on Monument Business Park and retention of Martin Baker (compliant with Policy EMP9 'New Employment Land at Chalgrove');
- It has unrivalled opportunity for investment to and address significant deficiencies in the local highway network (as set out in Policy TRANS1b 'Supporting Strategic Transport Investment', TRANS2 'Promoting Sustainable Transport and Accessibility' and TRANS3 'Safeguarding of Land for Strategic Transport Schemes'); and
- It provides an unrivalled opportunity for investment in infrastructure that improves the sustainability of the locality and wider rural area by reducing need to travel, providing new job opportunities as well as improved access to leisure and community facilities (as set out in Policy INF1 'Infrastructure Provision').

These wider benefits of the scheme are clearly identified and recognised in the supporting Sustainability Appraisal (Table 7.10) and within the outcomes of the Housing Background Paper. In particular, both the Sustainability Appraisal (Table 5.3) and ETI demonstrate that without the inclusion of Chalgrove and the infrastructure investment that would come forward as part of the development, there would be significant impacts that would not otherwise be addressed, resulting in less sustainable outcomes including:

- Significantly greater levels of traffic delay than those which include Chalgrove Airfield and associated infrastructure;
- Areas outside of Science Vale would not benefit from accommodating additional housing growth including local regeneration and supporting vitality and viability of local services, shops and community facilities.

- The provision of 3 Gypsy and Traveller pitches elsewhere in the District, without alternative sites currently identified;
- The proposed urban drainage strategy will incorporate drainage ditches, swales, ponds and open wetland areas to collect surface water run-off and convey the flows via a sustainable drainage system, directing them back into the Chalgrove Brook at greenfield run-off rates at a location west of Chalgrove. This will have a net effect in reducing the existing run-off from the airfield currently entering Chalgrove Brook to the east and centre of Chalgrove, which already suffers from flooding due to the effects of a large upstream catchment;
- The potential need to release further strategic sites from the Greenbelt or Area of Outstanding Natural Beauty.

In order to ensure that the above outcomes are secured, Homes England have worked, and will continue to work closely with SODC, OCC, local communities and other stakeholders to develop a detailed masterplan (www.chalgroveairfield.com) / Appendix 1 for the site and have publically committed to:

- The provision of two new 2FE Primary Schools;
- Providing over 10ha of land and a proportionate contribution towards a new secondary school and sixth form college which will enable the relocation of Icknield College as part of a modern, purpose built educational campus;
- The town centre has been designed to accommodate over 18,000sqm (GIA) commercial, community and leisure floorspace at the heart of the new community and 5 hectares of designated employment is provided which can deliver over 20,000sqm (GIA) employment floorspace, with the potential to create 1,000 new jobs on the site. This will stimulate the creation of new businesses and supporting the long term growth of Monument Business Park and Martin Baker and will create the fourth largest employment area in SODC (compliant with Policy EMP1 'The Amount and Distribution of New B-Class Employment Land', Policy EMP2 'Range, Size and Mix of Employment Premises' and Policy EMP9 'New Employment Land at Chalgrove' and Policy TC2 'Retail Hierarchy'). This floorspace will provide vital and affordable employment space that can meet the needs of SODC not catered for by the other strategic sites closer to Oxford
- Providing a policy compliant level of affordable housing, which over the course of the development will deliver approximately 1,200 new affordable homes within the District (compliant with Policy H9 'Affordable Housing');
- Providing a significant funding package, secured by S106 legal agreements and grampian planning conditions, towards onsite and offsite highways measures through direct mitigation or proportionate S106 contributions to new or improved roads, such as a bypass or edge-road, including sustainable transport improvements, and where appropriate in association with relevant Neighbourhood Development Plans and any wider Oxfordshire County Council highway infrastructure strategy, around, but not limited to Benson, Stadhampton and Chiselhampton and Watlington, including highways intervention measures to mitigate additional impacts, both transport and environmental (including air quality), in Cuxham, Chiselhampton, Little Milton, Shirburn and other settlements where justified. This is compliant with the list of infrastructure requirements set

out within policy STRAT7 'Land at Chalgrove Airfield';

- Providing a significant funding package towards public transport measures through direct mitigation or proportionate contributions to new or improved services to increase frequencies on the Oxford – Chalgrove bus route, local and strategic walking and cycling networks (as set out in Policy STRAT7 'Land at Chalgrove Airfield' Accessibility').

It should be recognised that Chalgrove Airfield is favourable on the basis of the significant benefits to SODC as a whole and that it is the only proposed strategic site outside of the Green Belt and which maximises the use of previously developed land. On the basis that the Site is suitable for the proposed development, available for the proposed development and proposed development is deliverable it is considered that Chalgrove Airfield represents a highly sustainable location for strategic development.

Chalgrove Airfield is Available – Chalgrove is in the ownership of Homes England, the Government's Housing Delivery Agency with a remit to unlock and enable land for development

Chalgrove Airfield was acquired by Homes England from the MoD in 2016, although Martin Baker as an existing tenancy that runs until 2063. A number of concerns have been raised about the availability of the site in terms of the airfield still being within operational use, the incompatibility of the proposed development with the retention of existing operations and Martin Baker's position in relation to surrendering their lease.

Responding to the above concerns, Homes England has made clear that the site is available on the basis that:

- By transferring the site to Homes England's ownership in 2016, the MoD confirmed that the site is no longer required for operational military purposes. This has been confirmed by RAF Benson and is not in dispute.
- Homes England has committed to safeguarding Martin Baker's operations permitted under their existing lease, including the re-provision of a CAA compliant runway, as required, including off-site if appropriate. This includes the storage and testing of explosives, the requirements for which have been established following engagement with the HSE and incorporated into the indicative masterplan.
- Homes England has made clear its intention to continue to engage with Martin Baker to negotiate the surrender of the lease. However, should this not be possible it will use its Compulsory Purchase Powers.

Chalgrove Airfield Proposal is Deliverable – Homes England is committed to bringing forward and accelerating housing delivery on the site over the SODC Plan Period

Homes England is the Government's Housing Delivery Agency tasked with accelerating housing delivery, ensuring more people have access to better homes in the right places. It will use its powers and resources to ensure that development on its land is brought forward as quickly as possible. While the outcome of any negotiation or CPO relating the surrender of the lease will need to be concluded before delivery on site can commence, Homes England has or will undertake the following to ensure that development can commence on site as early as possible and build out of the site be undertaken at pace:

- worked extensively and collaboratively with SODC, OCC throughout the preparation of the Local Plan to ensure requirements and potential constraints, and potential for delivery fully understood;

- Has developed an advanced masterplan – in conjunction with SODC, OCC and through multiple design review panels with BOB MK Design Panel since early 2017 – that is capable of addressing constraints and meeting the policy requirements of the Local Plan. It's preparation has been supported by extensive pre application engagement (in line with STRAT4 'Masterplans for Allocated Sites and Major Development')
- Has identified and committed to fund a comprehensive package of onsite and offsite infrastructure measures through S106 planning obligations to ensure development can commence in a timely manner. Where, through the S106 agreement, Homes England is responsible for providing funds to deliver the necessary infrastructure, it has already undertaken the necessary design feasibility and testing with a view of securing the necessary consents alongside determination of the main application. Where S106 funding from Homes England is not directly responsible for the funding and delivery of the required infrastructure, Homes England will use its wider influence to secure the necessary investment and / or seek to enter into relevant legal agreements and / or appropriate grampian planning conditions, supported where necessary by Memorandums of Understanding (MoU) with relevant infrastructure providers (inc. OCC and Highways England) to ensure that any issues relating to the funding and delivery of critical infrastructure are expediently addressed.
- Are in advanced stages of entering into a Planning Performance Agreement with SODC and OCC which confirms the willingness of both parties to secure outline consent for the scheme as early as possible following the examination process
- Will not hold the land for longer than necessary, making sure that it is disposed of in a way which meets local housing needs and accelerates housing delivery.
- Will dispose of the site on terms that promote early development, economic growth and achievement of the Government's housing market diversification objectives

In response to the above commitments, and Homes England's involvement and performance on other major strategic development sites at Burgess Hill and Northstowe; both the Sustainability Appraisal and SODC housing Background Paper confirm that there is confidence in Home England's ability to deliver and bring forward the proposed housing in a timely manner.

It should be noted that the SODC trajectory identifies development not coming forward on the site until 2026. While the reasons for this are understood and is considered prudent of SODC at this time when there remain some uncertainties around the point at which the site will become available; it is Homes England's intention to bring forward the site as early as possible and is targeting commencement of development on the site in 2022. On this basis there is a realistic prospect that the site can be delivered within the Plan period and that the indicative Local Plan target for Chalgrove Airfield of 2,025 new homes can be exceeded.

In doing so, Homes England notes Point 4 of STRAT 7 that requires the number and phasing of new homes to be permitted and timing of housing delivery linked to the planned infrastructure needs to be informed by further evidence. Homes England are committed to ensuring that both SODC and OCC fully support the provisions and is in principle committed to entering into a suitably worded legal agreement, and/or appropriately worded planning condition attached to any forthcoming planning permission requiring the completion of individual infrastructure works before

certain thresholds on the Site are reached.

Changes required to improve the soundness of Policy STRAT7

While Policy STRAT7 overall is supported and considered sound, there are elements of the policy as currently drafted does not reflect the developed masterplan proposals as guided by pre-application advice from SODC, OCC and through multiple design review panels with BOB MK since early 2017.

The policy as currently drafted appears to suggest that the development would be predominantly a residential development (with dedicated employment floorspace) and some small offerings of commercial/community use throughout.

During the numerous pre-application meetings with SODC, OCC and in particular the design review panels with BOB MK since 2017, Homes England have been encouraged to present the proposed development as a comprehensive development opportunity to provide an exemplar '21st Century Market Town' in South Oxfordshire. This aspect of the advice has been progressed by Homes England to ensure that the proposed development will be both sustainable and successful and it is considered that this position should be reflected within the policy and reflects the wider benefits of the scheme as acknowledged in the Sustainability Appraisal.

Homes England notes that once complete, Chalgrove (including the Airfield development) would have a population similar in number to Thame and should therefore be proactively planned with this in mind.

We do note the requirements of STRAT4 'Masterplans for Allocated Sites and Major Developments, and wish to reiterate that throughout the preparation of the planning application for development at Chalgrove Airfield, SODC, OCC and other local stakeholders have been consulted, and contributed to the indicative masterplan currently prepared. We would welcome confirmation of whether for the purpose of this emerging policy, the indicative masterplan currently prepared is considered 'agreed'.

Taking relevant points of the draft policy included within the policy in turn, Homes England provide comment and/or suggested amendments to the wording in *italics*.

1. Land within the strategic allocation at Chalgrove Airfield will be developed to deliver approximately 3,000 new homes with at least 2,025 to be delivered within the plan period, 5 hectares of employment land, 3 pitches for Gypsies and Travellers and supporting services and facilities –

*The following description of the development has been discussed with SODC during pre-application discussions and would provide a more accurate description of the development that is proposed: “**Land within the strategic allocation at Chalgrove Airfield will be developed to deliver approximately 3,000 new residential units and a town centre, up to 5 hectares of employment land (excluding the consolidation of the existing occupiers), sites for two primary schools and a secondary school, the removal of all runways on the Site and construction of a new runway, creation of new public open space providing land for playing fields, cemeteries and open green space together with associated vehicular, pedestrian and cycle access, drainage and landscaping works**”;*

2. Proposals to develop Chalgrove Airfield will be expected to deliver
 - i. Land safeguarded for the future operations of Martin-Baker to include a re-aligned runway to be designed in line with Civil Aviation Authority (CAA) standards

*Homes England support the general provisions of this policy requirement, however the policy should provide the flexibility should the requirements of Martin Baker change during the plan period. We suggest the following amended wording: “**land***

safeguarded for the demonstrable operational needs of Martin-Baker. This could include land to provide for a re-aligned runway to be designed in line with Civil Aviation Authority (CAA) standards or for a runway to be accommodated off-site if appropriate and technically feasible”

- ii. Development densities in accordance with Policy STRAT5

Homes England supports the optimisation of development sites to ensure that sites are developed efficiently, providing a suitable level of homes whilst balancing community and commercial facilities to create a successful and sustainable 21st Market Town.

However, for the reasons set out below, it is not clear if STRAT5 is sound in the manner in which SODC envisages applying it. Homes England request that further clarification is provided for calculating density of new homes within the District. Homes England notes in paragraph 4.54 of the emerging Local Plan that the methodology is contained within the Housing Topic Paper evidence base document, however, Homes England does not consider this is clear enough and the methodology for calculating ‘net’ and ‘gross’ areas for density, should be provided within the main Local Plan document to ensure that development is being delivered in line with the correct methodology to optimise housing delivery on sites.

Using Chalgrove Airfield as a specific example, assuming the development footprint of the Site that is currently proposed, the suggested density of 45 dph would result in the Site delivering around in excess of the 3,000 new homes identified within the Strategic Policy. This quantum of development is higher than envisaged under Policy STRAT7 (Land at Chalgrove Airfield) which estimates the site could be developed to provide around 3,000 new homes. For the avoidance of doubt, Homes England are proposing a density of development in line with emerging policy STRAT7 (3,000 new homes) but would be willing to explore with SODC further the opportunity to increase the density in the later phases of the scheme so that it is consistent with the density policies as a whole.

- vii. Provision of convenience floorspace that meets the day-to-day needs of the local community only without impacting on the vitality and viability of existing centres in accordance with Policy TC2 – Retail Hierarchy.

The proposed development at Chalgrove Airfield is being promoted as a 21st Century Market Town. As currently drafted, Homes England considers the success of the Town Centre could be undermined by not being given an appropriate position in the retail hierarchy. It should be made clear within the policy that a Town Centre is proposed at Chalgrove and not a local or district centre. Once complete, the development at Chalgrove would be of a comparable scale to Thame and Wallingford which are identified in the retail hierarchy as a Town Centre. Therefore we request that the wording within this policy and TC2 is amended to confirm that once complete, Chalgrove will be considered a Town Centre.

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:

Paragraph 4.62

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.

Homes England considers that the description of the history of Chalgrove airfield is correct, but the description of safeguarding and future expansion should be updated in line with our comments for STRAT7.

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.

Homes England considers that the last sentence be removed from this paragraph as it is a repeated elsewhere within the policy supporting text and policy wording. If this is not removed, the requirement should be updated in line with our comments for STRAT7.

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: Paragraph 4.63

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 paragraph is correct in identifying that there are no formal arrangements between RAF Benson and the MoD for the use of the Site and it is no longer required to support operational military uses.

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.

The paragraph should be amended to read:

“RAF Benson were consulted on the disposal of the airfield site and its transfer from the Ministry of Defence to Homes England. The MoD has confirmed that it has not held flying or landing rights since Martin Baker’s occupation of the site. Any existing arrangements has been agreed between RAF Benson and the tenants Martin-Baker, not the landowners. It has also stated that its disposal would not have proceeded if operations at Benson were impacted”.

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:

Paragraph 4.64

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 paragraph is not relevant and should be deleted. The level of detail included within this paragraph is excessive, unnecessary and not appropriate for the Local Plan. There is a clear and detailed discussion regarding the Martin Baker tenancy and of the availability of the issues within the supporting Housing Background Paper. It is appropriate for this level of detail to be contained in a supporting document and as such, a reference could be made to it.

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.

We request that the paragraph is deleted from the emerging Local Plan.

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:

Paragraph 4.65

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.

This site is being brought forward for development by the freehold owner and the concerns over its delivery can be addressed as set out in Homes England's response to Policy STRAT7.

Whilst the monitoring of the strategic allocation is important, this should be set out in the wider Monitoring and Review policies, as set out in Section 12 of the Draft Local Plan, and not be specific to STRAT7 and therefore this paragraph is not relevant and should be deleted.

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.

We request that the paragraph is deleted from the emerging Local Plan.

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:

STRAT5 – Residential Density

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.

Please see Homes England's formal response to STRAT7.

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.

Please see Homes England's formal response to STRAT7.

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:

H1 Delivering New Homes

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.

Please see Homes England's formal response to STRAT7.

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.

Please see Homes England's formal response to STRAT7.

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:

TC2 – Retail Hierarchy

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.

Please see Homes England's formal response to STRAT7.

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.

Please see Homes England's formal response to STRAT7.

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: Sustainability Appraisal – Table NTS.3

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.

Homes England consider Table NTS.3 of the Sustainability Appraisal to be legally compliant and sound.

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.

Homes England consider Table NTS.3 of the Sustainability Appraisal to be legally compliant and sound. However, we request that the assumptions in relation to the Development should include Cuxham Bypass.

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: Sustainability Appraisal Table 7.6

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.

Homes England consider Table 7.6 of the Sustainability Appraisal to be legally compliant and sound.

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.

SA Objective 5 and Paragraph 7.5.68

Chalgrove Airfield has been scored -1 (x) due to the potential to require "*the creation and operation of a runway, the pollutants that could result from this runway and their potential effects on existing and new residential developments needed to be considered*"

The proposal involves the potential for a new runway on the Site, or elsewhere, as part of the proposed development to meet the future demonstrable operational needs of Martin Baker. Any impacts will be fully considered as part of an EIA which will include an assessment relating to noise, air quality and other environmental factors and the final development will provide mitigation on all these matters. The existing runways are currently operated infrequently, and will continue to be so should a new runway be constructed on the Site. As such, the score should therefore have been 0.

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:

Sustainability Appraisal Table 7.9

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.

Homes England consider Table 7.9 of the Sustainability Appraisal to be legally compliant and sound.

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.

SODC concerns about the delivery of Chalgrove Airfield are noted however, Homes England has consistently demonstrated to the Council that development of the site is deliverable. Please see Homes England's formal response to STRAT9 for a full explanation of the deliverability of the Site.

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:

Sustainability Appraisal Appendix I

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.

Homes England consider Appendix I of the Sustainability Appraisal to be legally compliant and sound.

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.

Sustainability Objective 5 – Environmental Protection

Chalgrove Airfield has been scored -1 (x) due to the “*potential issues for new community and relocation of Martin-Baker on site*”.

It is not proposed that Martin Baker should be relocated. The proposal involves the potential for a new runway on the Site, or elsewhere, to meet the future demonstrable operational needs of Martin Baker, and retention of existing buildings on the Site. The existing runways are currently operated infrequently, and will continue to be so once should a new runway be constructed on the Site. Any impacts will be fully considered as part of an EIA which will include an assessment relating to noise, air quality and other environmental factors and the final development will provide mitigation on all these matters. This includes the storage and testing of explosives, the requirements for which have been established following engagement with the HSE and incorporated into the indicative masterplan. As such, the score should therefore have been 0.

Sustainability Objective 6 – Travel Choice

Chalgrove Airfield has been scored 1. The proposed development will provide 4 buses per hour between the Site and Oxford City Centre, and the Masterplan allows for full permeability of the Site for buses. The Masterplan allows buses to make a loop which mean that the vast majority of the Site and existing village will be within walking distance of the bus services. Alongside the

significant package of infrastructure improvements proposed, we consider that Chalgrove Airfield should have been scored 2.

Sustainability Objective 7 - Biodiversity

Chalgrove Airfield has been scored x on the basis that the HRA "*identified the site as having a medium risk on local biodiversity, primarily due to it scoring a 'High' on the potential risk of the site resulting in a net loss of biodiversity*". This reference is not made within the HRA and as a result, we consider the Site should be scored 0 as per the original SA.

SA Objective 9 – Historic Environment

Whilst the strategic allocation boundary does encroach on the registered battlefield, the proposal does not impact on this designation as there are no development proposed by Homes England to this area of the airfield, which would fall entirely within the demise of land safeguarded for future use by Martin Baker. The proposed development would not impact on any other designated heritage assets. Consistent with the potential for archaeological remains to be found, Chalgrove Airfield should be scored -1 (x).

SA Objective 11 – Flood Risk

If allowing for mitigation this should be scored as 2 as we have demonstrated that the mitigation proposed would improve the current situation.

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:

Sustainability Appraisal Appendix Q

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.

Homes England consider Appendix Q of the Sustainability Appraisal to be legally compliant and sound.

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.

Sustainability Objective 5 – Environmental Protection

Chalgrove Airfield has been scored -1 (x) due to the “*potential issues for new community and relocation of Martin-Baker on site*”.

It is not proposed that Martin Baker should be relocated. The proposal involves the potential for a new runway on the Site, or elsewhere, to meet the future demonstrable operational needs of Martin Baker, and retention of existing buildings on the Site. The existing runways are currently operated infrequently, and will continue to be so once should a new runway be constructed on the Site. Any impacts will be fully considered as part of an EIA which will include an assessment relating to noise, air quality and other environmental factors and the final development will provide mitigation on all these matters. This includes the storage and testing of explosives, the requirements for which have been established following engagement with the HSE and incorporated into the indicative masterplan. As such, the score should therefore have been 0.

Sustainability Objective 6 – Travel Choice

Chalgrove Airfield has been scored 1. The proposed development will provide 4 buses per hour between the Site and Oxford City Centre, and the Masterplan allows for full permeability of the Site for buses. The Masterplan allows buses to make a loop which mean that the vast majority of the Site and existing village will be within walking distance of the bus services. Alongside the

significant package of infrastructure improvements proposed, we consider that Chalgrove Airfield should have been scored 2.

Sustainability Objective 7 - Biodiversity

Chalgrove Airfield has been scored x on the basis that the HRA "*identified the site as having a medium risk on local biodiversity, primarily due to it scoring a 'High' on the potential risk of the site resulting in a net loss of biodiversity*". This reference is not made within the HRA and as a result, we consider the Site should be scored 0 as per the original SA.

SA Objective 9 – Historic Environment

Whilst the strategic allocation boundary does encroach on the registered battlefield, the proposal does not impact on this designation as there are no development proposed by Homes England to this area of the airfield, which would fall entirely within the demise of land safeguarded for future use by Martin Baker. The proposed development would not impact on any other designated heritage assets. Consistent with the potential for archaeological remains to be found, Chalgrove Airfield should be scored -1 (x).

SA Objective 11 – Flood Risk

If allowing for mitigation this should be scored as 2 as we have demonstrated that the mitigation proposed would improve the current situation.

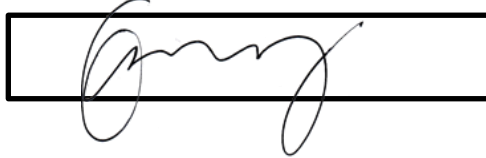
Would you like to participate at the oral part of the examination, which takes place as part of the examination process? *

Yes

No

* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature:



Date: 16 February 2019

Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

We have received assurance that the data passed to the planning inspector and programme officer will be kept securely and not used for any other purpose. The inspector and programme officer will retain the data up to six months after the plan has been adopted. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit www.southoxon.gov.uk/dataprotection

Future contact preferences

As explained in our data protection statement, in line with statutory regulations you will be contacted by the programme officer (and where necessary the council) with relevant updates on the Local Plan. South Oxfordshire and Vale of White Horse District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es):

- I would like to be added to the database to receive planning policy updates for South Oxfordshire
- I would also like to be added to the database to receive planning policy updates for Vale of White Horse

Further comment: Please use this space to provide further comment on the relevant questions in this form. You must state which question your comment relates to.

Alternative formats of this form are available on request. Please email planning.policy@southoxon.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

Please return this form 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.