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| South Black and White Logo | **South Oxfordshire Local Plan 2033**  Publication Version  Representation Form | | | | | | | | **Ref:**  **(For official use only)** | |  | |
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| **Name of the Local Plan to which this representation relates:** | | | | | | | | South Oxfordshire Local Plan 2033 | | |
| **Please return by** **5pm on Thursday 30 November 2017 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) | | | | | | | | | | |
| This form has two parts:  **Part A** – Personal Details  **Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make. | | | | | | | | | | |
| **Part A** | | | | | | | | | | |
| 1. Personal Details\* | |  |  |  |  |  | 2. Agent’s Details (if applicable) | | |  | |
| \*If an agent is appointed, please complete only the Title, Name and Organisation  boxes below but complete the full contact details of the agent in 2. | | | | | | | | | | |  | |
| Title | | Mrs | | |  |  | | | | |
|  | | | | | |  | | | | |
| First Name | | Helen | | |  |  | | | | |
|  | | | | | |  | | | | |
| Last Name | | Marshall | | |  |  | | | | |
|  | | | | | |  | | | | |
| Job Title (where relevant) | | Director | | |  |  | | | | |
|  | | | | | |  | | | | |
| Organisation representing | | CPRE Oxfordshire | | |  |  | | | | |
| (where relevant) | | | | | |  | | | | |
| Address Line 1 | | 20 High Street | | |  |  | | | | |
|  | | | | | |  | | | | |
| Address Line 2 | |  | | |  |  | | | | |
|  | | | | | |  | | | | |
| Address Line 3 | |  | | |  |  | | | | |
|  | | | | | |  | | | | |
| Postal Town | | Watlington | | |  |  | | | | |
|  | | | | | |  | | | | |
| Post Code | | OX49 5PY | | |  |  | | | | |
|  | | | | | |  | | | | |
| Telephone Number | | 01491 612079 | | |  |  | | | | |
|  | | | | | |  | | | | |
| Email Address | | director@cpreoxon.org.uk | | |  |  | | | | |
| **Sharing your details**: please see page 3 | | | | | |  | | | | |

**Part B – Please use a separate sheet for each representation**

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

**ENV 12 (and ENV 11 & DES 6)**

4. Do you consider the Local Plan is: (*Please tick as appropriate)*

4. (1) Legally compliant Yes

4. (2) Sound **NO**

4. (3) Complies with the Duty to Cooperate Yes

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| 5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments. |
| **ENV 12 - Pollution - Impact of Development on Human Health, the Natural Environment and/or Local Amenity**  **(and ENV 11 - Pollution - Impact from Existing Existing and/or Previous Land Uses on New Development**  **And DES6 - Residential Amenity)**  Whilst we have no issue with the wording as such, we feel that it (and the Plan as a whole) misses a vital opportunity to include a robust Dark Skies policy that currently leaves the Plan unsound.  The NPPF does NOT restrict policy on light pollution merely to controlling or minimising additional light pollution arising from new development, but requires local authorities to adopt a more proactive position to replace poor design and enhance (not just conserve) the environment, including intrinsically dark landscapes and wildlife, not just people’s local amenity.  As a policy objective “Dark Skies” is the positive counterpart of tackling light pollution and includes not only preventing additional new intrusion but also seeking to remedy existing problems. It would be particularly of relevance in relation to maintaining and enhancing the tranquillity of the North Wessex Downs Area of Outstanding Natural Beauty.  It may be helpful to refer to CPRE’s report *Night Blight* which has revealed more about the nature of problem caused by light pollution, and has also highlighted ways in which it can not only be contained but actively reduced.  (See: <https://nightblight.cpre.org.uk/images/resources/Night_Blight_cpre.pdf>).  (Continue on page 4 /expand box if necessary) |

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| 6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. |
| The key recommendations of CPRE’s nationwide study on Dark Skies *Shedding Light* (2014) should be considered:   * Policies to control light pollution should include identifying existing dark areas that need protecting. * A strong presumption against new lighting in existing dark areas, unless essential as part of a new development or for public safety reasons that have been clearly demonstrated. * Street lighting policy to include Environmental Lighting Zones to ensure that the appropriate lighting levels with very strict requirements applying in identified dark areas. * Adoption of part-night lighting schemes (e.g. switching off between midnight and 5am) or dimming. * Careful consideration (in conjunction with Highways authorities) to the type of Light Emitting Diodes (LED) lighting allowed and the potential impacts that higher temperature blue rich lighting has on ecology and on human health. * Targets (in conjunction with Highways authorities) for replacing all their street and road lights with less light polluting types. * Testing in situ of any new street lighting before being rolled out across a wider area. * Adopt monitoring procedures that include collaboration with the Institution of Lighting Professionals/LANTERNS research project which aims to quantify any effects of changes to street lighting on road traffic accidents and crime.   (Continue on page 4 /expand box if necessary) |

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**Yes**, I wish to participate at the

oral examination

✓

**No**, I do not wish to participate at the

oral examition

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| 8. If you wish to participate at the oral part of the examination, please outline why  you consider this to be necessary:  CPRE represents the views of its members across the District, is well-informed on the issues and would very much wish to contribute to any related discussion. |
| ***Please note*** *the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.* |

Signature: Date:

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by South Oxfordshire District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

✓

I would like to be kept informed about the progress of the Local Plan

✓

I would like to be added to the database to receive general planning updates

Please do not contact me again

**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 contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)

**Please return this form by** **5pm on Thursday 30 November 2017 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)