

# 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](mailto: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	Mrs	
Full Name	Helen	
Job Title (where relevant)	Marshall	
Organisation (where relevant)	CPRE OXFORDSHIRE	
Address Line 1	20 High Street	
Address Line 2		
Address Line 3		
Postal Town	Watlington	
Postcode	OX49 5AF	
Telephone Number	01491 612079	
Email Address	campaign@cpreoxon.org.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:

**DES8 - Efficient Use of Resources**

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.

**CPRE welcomes the Council’s move to establish higher density targets across a range of different settlement types and to lift minimum density requirements. However, this policy as written (at least 30 dwellings per hectare) is inconsistent with Strat 5 – Residential Densities (a minimum net density of 35 dwellings per hectare, for ‘other villages’).**

Land should be used as sparingly as possible to preserve the rural environment, maximize carbon storage and food production. This is not only National Policy (for example the Climate Change Act 2008) but is a basic tenant of sustainable development. The District already has a large stock of wasteful low density executive houses - the crying need is to balance the whole housing stock with lower cost smaller houses, at higher densities, maximizing use of expensive land.

CPRE contends there are two imperatives for the District, to develop more low-cost housing for younger people and to provide small, compact housing for the increasingly aging population. Both these groups also need housing which is close to transport infrastructure and social facilities. All these factors would be helped by building at higher densities within and close to urban centres.

High density housing is not tower blocks. Jericho in Oxford is an example of very desirable high-density development. One-time farmworkers’ housing in many villages is similar. This is typically 70 dwellings to the hectare or higher. Urban densities can be higher still.

We are pleased that the Council has agreed to lift minimum density from the initial of 25 houses per hectare in the early drafts of the Plan, a figure below the minimum level of the old PPG3 of 30 (which was the minimum), and now recognises that higher densities are possible and will provide the much needed smaller units that are needed, to meet the housing mix identified in the SHMAA but that the Annual Monitoring Report shows is not currently being delivered.

However, Para 1 states “New development is required to make provision for the effective use and protection of natural resources where applicable, including: i) the efficient use of land, with densities of at least 30 dwellings per hectare,...”.

This is contrary to STAT 5 Residential Densities which give a minimum net density of 35 for other villages.

We do have concerns that this policy may mean that current made Neighbourhood Developed Plans (NDP), and in progress NDP revisions which have been developed at lower density rates will no longer comply with the local plan. Whilst this could mean a more balanced housing mix, it could cause a planning vacuum and result in a big and unplanned for increase in residents for the larger villages and towns.

(Continue on page 4 if necessary)

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.

1. **The policy should be corrected to reflect the density levels shown in STRAT 5.**
2. Security must be given to those settlements with made Neighbourhood Development Plans that any increase in density requirements on those already agreed in detail will only be applied through review of the Neighbourhood Plan after 5 years of passing.

Within a Neighbourhood Planning Area any allocated sites that have not commenced should be developed in accordance with the new density requirements, and any land that is not required to meet the housing numbers required & associated infrastructure gains, in the respective NDP should remain undeveloped within this planning period.

For the Strategic Sites, less land than indicated will be required to deliver the housing numbers, and any land not required to meet these densities, should be removed from allocation for development, and if in the Green Belt this land should remain as Green Belt land, and protected from development.

3. Point ii) should be changed from:  
ii) minimising waste and making adequate provision for the recycling, composting and recovery of waste on site using recycled and energy efficient materials  
TO

- ii) minimising waste and making adequate provision for the recycling, composting and recovery of waste on site
- iii) using recycled and energy efficient materials

4. Point iv) should be changed from:

iv) making efficient use of water, for example through rainwater harvesting and grey water recycling causing no deterioration in, and where possible, achieving improvements in water quality (including groundwater quality)

TO

- v) making efficient use of water, for example through rainwater harvesting and grey water recycling
- vi) causing no deterioration in, and where possible, achieving improvements in water quality

(Continue on page 4 if necessary)

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:

(this can be electronic)

Date:

15.2.19

### 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](http://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](mailto:planning.policy@southoxon.gov.uk) or call 01235 422600 (Text phone users add 18001 before you dial).

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