

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"/>	<input type="text" value="Mr"/>
Full Name	<input type="text"/>	<input type="text" value="Brian Flynn"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate"/>
Organisation (where relevant)	<input type="text" value="Croudace Homes Ltd"/>	<input type="text" value="Carter Jonas LLP"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="One Station Square"/>
Address Line 2	<input type="text" value="The Spirella Building"/>	<input type="text"/>
Address Line 3	<input type="text" value="Bridge Road"/>	<input type="text"/>
Postal Town	<input type="text" value="Letchworth, Hertfordshire"/>	<input type="text" value="Cambridge"/>
Postcode	<input type="text" value="SG6 4ET"/>	<input type="text" value="CB1 2GA"/>
Telephone Number	<input type="text"/>	<input type="text" value="██████████"/>
Email Address	<input type="text"/>	<input type="text" value="████████████████████"/>

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:

Table 5c

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.

Table 5c of the Final Publication version of the South Oxfordshire Local Plan 2034 (FPSOLP2034) identifies the expected sources of the housing supply during the plan period. In summary, the housing land supply comprises outstanding commitments (sites with planning permission and previous development plan allocations), proposed strategic allocations, neighbourhood plan allocations, and windfall sites. It appears that the housing land supply is reliant on the delivery of strategic allocations and development coming forward through neighbourhood plans, and a limited amount of development is directed to the market towns including Wallingford.

The housing trajectory for FPSOLP2034 is illustrated in graphic form in Appendix 8. However, the detailed information on the predicted timing and delivery of development at all of the sites that make up the housing supply has not been provided. It is noted that Appendix 1.2 of the Infrastructure Delivery Plan Update January 2019 provides a housing trajectory for the proposed strategic allocations only.

Paragraph 73 of NPPF2 states in part that “*Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites....*”. It is considered that a housing trajectory in graphic form only is inadequate, and insufficient information is provided to demonstrate that a deliverable housing land supply can be maintained for the whole of the plan period. It is requested that a detailed housing trajectory containing information on the predicted timing and delivery of development at all of the sites that make up the housing supply is provided in FPSOLP2034.

Paragraph 72(d) of NPPF 2 expects local planning authorities to: “*make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)³⁵,...*”. The housing trajectory for the proposed strategic allocations is provided in Appendix 1.2 of the Infrastructure Delivery Plan Update January 2019, but there is no information on housing delivery at other larger commitments included in the supply, and as such it is difficult to determine whether housing delivery rates are realistic and sufficient to maintain a deliverable

housing land supply throughout the plan period. Therefore, general comments about the housing trajectory are provided below.

The policies for each of the strategic allocation sites in FPSOLP2034 require a masterplan document to be prepared and approved by the Council in advance of any planning applications. There are a number of actions that will need to be completed before development can commence on the proposed strategic allocations e.g. approve masterplans, prepare and submit the outline planning application documents, determine the outline planning application, complete negotiations on the S106 Agreement, discharge relevant conditions, market land parcels to housebuilders, appoint housebuilders, submit reserved matters, and complete primary infrastructure. It is considered that these actions will take some time to complete, and need to be fully reflected in the housing trajectory.

As set out above, there is currently no detailed information on housing delivery for the sites that make up the housing supply. There is recent national evidence available on housing delivery rates. Nathaniel Lichfield & Partners published a research report 'Start to Finish - How Quickly do Large-Scale Housing Sites Deliver?' (November 2016) which provided evidence on the speed and rate of delivery of large-scale housing developments – see <http://lichfields.uk/content/insights/?article=start-to-finish-how-quickly-do-large-scale-housing-sites-deliver&archive>. The key findings of the research report that it is considered are particularly relevant for the proposed strategic allocations are as follows:

- 3.9 years the average lead in time for large sites prior to the submission of the first planning application;
- 6.1 years the average planning approval period of schemes of 2,000+1 dwellings, and the average for all large sites is circa 5 years; and,
- the average annual build rate for a scheme of 2,000+ dwellings is 161 dwellings per year.

It is considered that the assumptions about the commencement of development at the strategic allocations are unrealistic, and should be amended to realistically reflect the actions that still need to be completed and national evidence on housing delivery rates. It is considered that an annual delivery rate in excess of 200 dwellings per annum at the proposed strategic allocations would be unrealistic.

As set out in Croudace Home's representations to Policy STRAT 10 the proposed strategic allocation at land at Berinsfield should be deleted because it is located in the Green Belt, and non-Green Belt sites in more sustainable settlements are available. It is requested that land at Berinsfield should not be included in the housing trajectory.

(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.

It is requested that a detailed housing trajectory containing information on the predicted timing and delivery of development at all of the sites that make up the housing supply is provided in FPSOLP2034. It is requested that the detailed housing trajectory, once published, should contain realistic assumptions about housing delivery taking into account the actions that still need to be completed and national evidence on housing delivery rates.

(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:

18/02/19

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

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).

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