

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:

Policy H3

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.

Policy H3 of the Final Publication version of South Oxfordshire Local Plan 2034 (FPSOLP2034) specifies an overall housing requirement of 3,873 dwellings for the market towns, with 1,285 dwellings for Henley, 1,318 dwellings for Thame, and 1,070 dwellings for Wallingford (although this is not mentioned in the policy). It is expected that the additional housing will be identified through the neighbourhood plan processes, provided the document is completed within 12 months of the adoption of the Local Plan.

Croudace Homes object to Policy H3 for the following reasons: firstly, the focus on neighbourhood plans; and, secondly the use of a standard and arbitrary percentage growth target.

Croudace Homes is promoting land at Wantage Road in Wallingford for residential development.

Firstly, there is an over-reliance on neighbourhood plans to deliver development in the market towns. Thame and Henley have already adopted neighbourhood plans, which assessed and subsequently allocated a number of suitable sites for housing, and it is not clear whether there is subsequently much local support in these towns to review the neighbourhood plans in order to accommodate more development. The emerging Wallingford Neighbourhood Plan makes no housing allocations, although earlier versions of the document did favour an allocation on part of Croudace Homes site for up to 500 dwellings. The 'made' Brightwell-cum-Sotwell allocates a number of small housing sites within and adjacent to the village.

It is considered that the neighbourhood plan process is unlikely to tackle the key issues that need to be resolved in Wallingford, particularly if the housing requirement is increased to address market signals and growth (see representations to Policy STRAT2) and an alternative non-Green Belt site to land at Berinsfield needs to be allocated (see representations to Policy STRAT10). It is considered that the more sustainable settlements i.e. the market towns, which have a good range of services and facilities and where there are no environmental or infrastructure constraints, are suitable locations to accommodate those additional dwellings. Wallingford falls within this category, and it is requested that the overall housing target (in Policy STRAT2) and the housing target for Wallingford (in Policy H3) are increased to accommodate more housing.

Wallingford is a suitable location for additional development, and decisions about its growth and allocations to accommodate that growth should be made through the Local Plan rather than the neighbourhood plan process.

We have an associated concern that insufficient time has been allowed through the neighbourhood plan process to gather evidence, assess alternative site allocations, undertake a strategic environmental assessment, and consult with the local community; Policy H3 only allows 12 months for a neighbourhood plan to be prepared following adoption of FPSOLP2034. There is a substantial amount of detailed work that needs to be undertaken by the designated neighbourhood plan group to enable it to take the required strategic decisions anticipated by the approach in FPSOLP2034 to deliver development in market towns. It is considered that these decisions should be taken by the Council through the Local Plan and not delegated to the neighbourhood plan level.

There is an additional factor relevant to Wallingford which indicates that the reliance on the neighbourhood plan process to deliver strategic housing development is inappropriate, which relates to cross boundary matters outside the designated area for such plans. The designated area for the emerging Wallingford Neighbourhood Plan is quite tightly drawn around the town boundary, with the area covered by the Brightwell-cum-Sotwell Neighbourhood Plan adjacent to the northern and western boundary. The two neighbourhood plans are at different stages; the Brightwell-cum-Sotwell Neighbourhood Plan was made on 12th October 2017, while a draft version of the Wallingford Neighbourhood Plan is still being prepared. It is noted that an earlier version of the emerging Wallingford Neighbourhood Plan identified part of the site promoted by Croudace Homes as the most suitable location for a housing allocation (Ref: Land North of Wallingford (east) - Site A2), but this site has not been carried forward because subsequently planning permission has been granted for one major residential development in Wallingford and it was resolved to grant permission for another. The planning application process and the housing land supply shortfall that previously existed means that the Wallingford Neighbourhood plan process was effectively bypassed. It is anticipated that the two major residential developments in Wallingford will be delivered in the short term, and as such no residential development of any significance is proposed in the middle and later years of the plan period, which represents an inappropriate strategy. The emerging Wallingford Neighbourhood Plan process does not address future housing and affordable housing needs because it makes no allocations.

The defined boundaries and the different timescales for the neighbourhood plans of the adjacent areas of Brightwell-cum-Sotwell and Wallingford undermines the delivery of comprehensive and strategic scale development which has cross boundary implications. For example, larger developments normally require new highway access and junction arrangements, community and other local infrastructure, open space, and green infrastructure including strategic landscaping at the site boundary. In the case of Wallingford it is probable that the delivery of all these items would be necessary for a comprehensive and high quality development, however, some of these items and the strategic landscaping in particular would require land outside of the designated neighbourhood plan area (within Brightwell-cum-Sotwell Parish) but were not considered as part of that neighbourhood plan process.

It is considered that the boundaries of a neighbourhood plan area and the different timescales for neighbourhood plans in adjoining areas has and will undermine the delivery of comprehensive and high quality development at Wallingford. It supports the case for decisions on allocations at the market town level to be made through the Local Plan rather than delegated to the neighbourhood plan process. There is no mechanism within Policy H3 or the neighbourhood plan process for the cross boundary implications of development to be considered. This indirectly excludes growth in adjacent parishes purely on an administrative point rather than on planning reasons, which is not effective and is unsound.

Secondly, the use of a standard percentage growth target of 15% for market towns is not based on the principles of sustainable development and takes no account of potential constraints at some towns. It is considered that a 15% growth target for the largest and most sustainable settlements within South Oxfordshire is too low. There are no constraints to additional development at Wallingford.

The approach of directing growth to locations according to their status in the settlement hierarchy is appropriate i.e. more development to the market towns because these are the most sustainable locations and contain a good range of services and facilities. However, the use of a standard percentage growth target of 15% for all market towns is too simplistic. This approach takes no account of the environmental or infrastructure constraints at individual villages, the actual need for additional housing or affordable housing within those villages, and the opportunity to support existing services and facilities or provide additional facilities by more development at some villages. This approach is not based on the principles of sustainable development. It is very likely that nature conservation, landscape, flooding or highway constraints will limit the growth of some towns and villages so that the target of 15% growth cannot be achieved, whereas other towns and villages e.g. Wallingford will not be constrained and could accommodate more than 15% growth. For these reasons, Croudace Homes do not support the use of a standard percentage growth target and request that it is deleted.

It is requested that sites are allocated in Wallingford to meet the housing requirements, subject to an assessment of environmental and infrastructure capacity, housing need, and the opportunities associated with development at individual settlements.

The realistic options for significant growth in South Oxfordshire are the larger settlements of Henley-on-Thames, Thame, Didcot and Wallingford. Didcot has already been identified for significant levels of growth, and housing monitoring data demonstrates that housing delivery is lower than anticipated which has previously contributed to a housing shortfall. Henley is constrained by flooding and the AONB and the adopted Core Strategy imposed a limit of 400 dwellings in this town, and the adopted Joint Henley & Harpsden Neighbourhood Plan includes a housing target of 500 dwellings. The adopted Thame Neighbourhood Plan 2013 has already identified housing allocations within the town for 775 dwellings, and a reserve list of sites for 135 dwellings.

The final sentence of Paragraph 5.16 highlights the uncertainty about whether the proposed dwelling targets in Henley and Thame will actually be delivered, and states: *“Ultimately the detailed evidence base will need to be provided to support each Neighbourhood Development Plan and its assessment of capacity, whether this is to support a higher or lower number than that provided in Table 5d: Provision of homes at the market towns”*. In contrast, there are no significant constraints at Wallingford.

It is requested that additional development is directed to Wallingford if the housing requirement is increased to address market signals and growth (see representations to Policy STRAT2) and an alternative non-Green Belt site to land at Berinsfield needs to be allocated (see representations to Policy STRAT10). Croudace Homes is promoting land at Wantage Road in Wallingford, and as set out the representations to Policy WAL, it is requested that this site is specifically allocated for residential development in a new policy.

The following additional factors should be used to determine the appropriate level of additional housing at Wallingford:

- the affordable housing needs of Wallingford and the scale of development required to deliver policy compliant levels of affordable housing to meet that need;
- an assessment of the level of development required to tackle some of the key issues that need to be addressed in Wallingford, including support for the town centre and infrastructure capacity;
- the environmental capacity of promoted sites taking into account mitigation measures to address the impacts of development; and,
- to take advantage of the opportunities created by development to deliver improvements to local infrastructure and benefits for the local community.

(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 the use of a standard percentage growth target for the market towns is deleted.

It is requested that suitable sites in market towns, including Wallingford, are allocated through the FPSOLP2034 process to meet identified development needs, with the opportunity for additional sites over and above identified needs considered through the neighbourhood plan process.

It is request that the housing target for Henley and Thame are assessed in detail and fully reflect the constraints within those towns and the housing allocations and quantum of development identified in the adopted Neighbourhood Plans for these towns.

As set out in representations to Policy WAL1, it is requested that land at Wantage Road in Wallingford is specifically allocated for residential development in a new policy.

(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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