

# 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	<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="REDACTED"/>
Email Address	<input type="text"/>	<input type="text" value="REDACTED"/>

For information on **sharing your details**: please see page 3

## 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:

STRAT 5

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 STRAT 5 identifies the minimum net densities that will be applied to different settlements. Section 5 and Appendix 2 of the Council's Housing Topic Paper provide the evidence to justify the proposed densities, including examples of densities from elsewhere in South Oxfordshire. Croudace Homes is concerned that the measured site areas of the examples referred to in the evidence do not include all of the substantial areas of open space, landscaping and non-residential uses that were provided within those developments. As a result, it is considered that the gross and net densities of these example areas will be much lower than currently estimated.

Croudace Homes is involved in the delivery of a strategic site at Didcot for 1,880 dwellings, which illustrates that net densities will be much lower than those proposed in Policy STRAT 5. The Croudace Homes site has a total area of 142.55ha, but with all of the policy requirements the developable area of the site is 54ha. The gross density of the proposed development would be 13dph and the net density would be 35dph, which is substantially less than the estimated densities at the examples from Didcot referred to in the evidence, and much lower than the proposed minimum net density of 70dph for Didcot.

Croudace Homes acknowledge the aspirations to use land more efficiently and to increase densities within residential development. However, those densities need to be realistic and appropriate to reflect the character of the site surroundings and the policy requirements to deliver the necessary infrastructure including green infrastructure within a strategic site. Therefore, it is considered that the evidence on densities provided in the Housing Topic Paper is not robust, and as such, the proposed densities are not justified and are unsound.

The net densities applied to other recent large and strategic development in South Oxfordshire approved through the Development Management process should be used to inform the appropriate densities in Policy STRAT 5. The Croudace Homes site in Didcot and the recent proposed developments in Wallingford provide examples of typical densities which have been approved.

(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 densities at recently approved strategic sites in South Oxfordshire, which include strategic infrastructure including green infrastructure should be used to inform the minimum net densities at different settlements in Policy STRAT 5.

(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](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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