

# 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="██████████"/>
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 STRAT 6

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 6 of the Final Publication version of the South Oxfordshire Local Plan 2034 (FPSOLP2034) describes the strategy towards the Green Belt. In summary, the proposed strategy seeks to protect the Green Belt from inappropriate development, and release land from the Green Belt to accommodate strategic allocations. The strategic allocations are at STRAT8, STRAT9, STRAT10, STRAT11, STRAT12, STRAT13 and STRAT14.

Croudace Homes do not object to the proposed strategic allocations (except Policy STRAT10 - Land at Berinsfield), but do comment on housing delivery and the potential constraints to delivery at some of these sites in representations to Table 5c. Croudace Homes do object to the decision to release land from the Green Belt, when available non-Green Belt sites in sustainable locations e.g. at Wallingford have not been assessed as options to partly meet development needs as an alternative to Green Belt land; this approach is inconsistent with Paragraph 137 of NPPF2.

Croudace Homes is promoting land off Wantage Road in Wallingford for residential development. The site is located beyond the Green Belt. It is considered that the site is suitable and available for development and is deliverable. Wallingford is identified as one of the most sustainable locations for development in South Oxfordshire. In these circumstances the site should have been assessed and allocated in preference to some of the Green Belt land that has been released at the strategic allocations.

Chapter 13 of NPPF2 sets out the national guidance for Green Belt. Paragraph 137 states in part :

*“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development....”*

The Green Belt Assessment of Strategic Sites in South Oxfordshire December 2018 assessed the proposed strategic sites against the purposes for including land within the Green Belt, in order to determine whether those sites could be allocated for development. The Strategic Housing and Economic Land Availability Assessment January 2019 (SHELAA) assessed the suitability,

availability, achievability and deliverability of promoted sites, in order to determine which sites could be allocated for development to meet identified development needs.

There is no evidence that the assessment of non-Green Belt sites to meet identified development needs has been undertaken by the Council, as required by Paragraph 137 of NPPF2. It is considered that the Council should have assessed suitable sites in the SHELAA in order to determine whether some of those sites could have accommodated some (or all) of the development that is proposed to be released from the Green Belt. It is considered that reasonable non-Green Belt options exist, including land at Wantage Road in Wallingford, to meet a proportion of the land that is proposed to be released from the Green Belt in FPSOLP2034. The failure to fully examine all reasonable alternatives to meet identified development needs, in preference to releasing land from the Green Belt, is not consistent with national guidance and is unsound.

Croudace Homes' representations to Policy STRAT 10 (Land at Berinsfield) comment specifically on this strategic allocation, which is proposed to be released from the Green Belt for 1,700 dwellings. It is considered that land at Wantage Road in Wallingford represents a reasonable alternative to the allocation at Berinsfield. In addition, Wallingford is a more sustainable location for development compared with Berinsfield, as demonstrated in the Settlement Assessment Background Paper 2018. It is requested in the representations to Policy STRAT10 that this strategic allocation is deleted.

Croudace Homes' representations to Policy WAL1 provides detailed commentary for the promoted development at land at Wantage Road in Wallingford. The site was assessed in the SHELAA in conjunction with land to the west (Site Ref. 928). The site assessment identified no constraints to development at the larger site. The Development Framework Document prepared for the site, and submitted with representations to Policy WAL1, identifies two development options for the site as follows:

- The first option uses only the southern field, extending only as far as the existing shelterbelt. This option allows for between 490 and 552 dwellings to be provided at a net density of 30-35 dwellings per hectare.
- The second option uses the entire site to provide an urban extension of between 972 and 1,096 dwellings, with substantial areas of open space and a country park. This option also includes land for primary school and a local centre.

It is requested in the representation to Policy WAL1 that land at Wantage Road in Wallingford is allocated as a strategic allocation, to meet a higher housing target and as an alternative to releasing land from the Green Belt at Berinsfield.

(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 all reasonable non-Green Belt site options are assessed, in order to determine whether alternative sites exist that could accommodate a proportion of the land to be released from the Green Belt through the strategic allocations. This assessment process would be consistent with Paragraph 137 of NPPF2.

(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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