

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 STRAT 10

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 10 of the Final Publication version of the South Oxfordshire Local Plan 2034 (FPSOLP2034) relates to the strategic allocation at land at Berinsfield. It is proposed that the site will be released from the Green Belt. Croudace Homes object to this strategic allocation for three reasons. Firstly, there has been no assessment of reasonable non-Green Belt options to meet identified development needs, as required by Paragraph 137 of NPPF2 where land is to be released from the Green Belt. Secondly, it is noted that the proposed development needs to deliver a number of new transport infrastructure projects including a new road and junction improvements, and to contribute towards junction improvements elsewhere, but the costs associated with the transport infrastructure projects are unknown, and there is no evidence to demonstrate that the proposed development is viable with these costs included while also meeting all other policy requirements. Thirdly, there are non-Green Belt option available at more sustainable settlements that could meet the quantum of development proposed at Berinsfield e.g. land at Wantage Road in Wallingford. Fourthly, Wallingford is a more sustainable option in transport terms compared with Berinsfield.

Firstly, Chapter 13 of NPPF2 sets out the national guidance for Green Belt and Paragraph 137 expects all reasonable options for meeting identified development needs to be fully examined before land is released from the Green Belt. 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. However, 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, including the proposed strategic allocation at land at Berinsfield. 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. The land at Berinsfield is assessed in the Green Belt Assessment, and it is concluded that development at most of the site would result in 'high' harm to the Green Belt – see pg.67 to 68 of Green Belt Assessment. In these circumstances, the decision to release this site from the Green Belt is not supported by evidence.

Secondly, Criteria 2(vi) of Policy STRAT10 identifies a number of transport improvement projects that need to be delivered as part of the proposed development, and other transport improvements in the wider highway network that the proposed development will need to contribute towards via planning obligations. It is considered that the cost of delivering and funding these transport projects will be significant. Appendix 2.1 of the Infrastructure Delivery Plan January 2019 Update sets out the infrastructure schedule for the strategic allocation at Berinsfield. It is noted that there are some significant costs associated with the identified infrastructure projects, and that the developer of the proposed development is expected to contribute towards all of the proposed infrastructure projects. It is also noted that no estimate of costs have been provided for utilities upgrades, the new access on to A4074, and public transport improvements. The costs of these projects will also be significant. Criteria 2(ii) of Policy STRAT10 expects the proposed development to deliver affordable housing in accordance with Policy H9, which in this case would be 40%. There is no evidence that the unknown costs associated within the transport infrastructure projects have been factored into the viability assessment, and that the proposed development at Berinsfield can adequately fund all of the identified infrastructure projects that are required and deliver policy compliant levels of affordable housing, and remain viable. It is requested that evidence is provided to confirm that the proposed strategic allocation at Berinsfield is viable, as required by Paragraph 57 of NPPF2.

Thirdly, Croudace Homes is promoting land at Wantage Road in Wallingford for a strategic allocation; a detailed assessed of the promoted development is contained in representations to Policy WAL1. It is considered that land at Wantage Road in Wallingford, which is not located within the Green Belt, 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. The Settlement Assessment Background Paper assessed each of the settlements within South Oxfordshire in terms of the services and facilities, proximity to other settlements and employment, and access by public transport, and scored each settlement for these criteria. Wallingford is defined as a town in the settlement hierarchy, and achieved an overall score of 794, whereas Berinsfield is defined as a larger village and achieved an overall score of 111. It is clear from the assessment that Wallingford scores significantly better than Berinsfield in terms of the services and facilities it provides, access to employment, and accessibility by public transport, and confirms that Wallingford is a sustainable settlement. In addition, Wallingford is well-related to employment opportunities at Oxford and Culham. Therefore, additional development at Wallingford should have been considered in preference to releasing land from the Green Belt at Berinsfield, and as demonstrated in Croudace Homes' representations to Policy WAL1 the land at Wantage Road in Wallingford represents a suitable site for an additional or alternative strategic allocation.

Fourthly, Wallingford is defined as a market town because it has a good range of services and facilities, including shops, schools, hospital, library, post office, sport, leisure and recreation. Wallingford contains an industrial area within the town, and it has good connections to employment opportunities at Oxford and Science Vale. It is accessible to Oxford, Reading, Didcot and other nearby towns and villages by bus. Wallingford is on the National Cycle Network (Thames Valley Route No.5) which provides connections to Didcot and there are local designated cycle routes within the town and the surrounding area, making it accessible by cycle. National guidance links patterns of growth with sustainable modes of transport, and seeks to encourage the use of public transport, walking and cycling; Wallingford would satisfy this preferred approach. In comparison, the proposed development at Berinsfield will need to deliver additional facilities and new sustainable transport services.

(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.

It is requested that land at Berinsfield (Policy STRAT10) is deleted as a strategic allocation, and replaced with land at Wantage Road in Wallingford (see Croudace Homes' representations to Policy WAL1).

(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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