

18<sup>th</sup> February 2019

By email to:

[Planning.policy@southoxon.gov.uk](mailto:Planning.policy@southoxon.gov.uk)



Dear Sir/Madam

**SOUTH OXFORDSHIRE LOCAL PLAN 2034**  
**REPRESENTATIONS ON BEHALF OF DE MERKE ESTATES AND M.K.DOGAR LIMITED**

De Merke Estates and M.K Dogar Limited submitted representations to the Oxford Local Plan 2036 Regulation 19 consultation in November 2018, which demonstrated that Oxford City Council had failed to recognise the opportunity that exists to accommodate approximately 270-360 dwellings on 16.93ha (9ha developable) of land in a sustainable manner situated adjacent to the northern side of Oxford city at Old Marston.

In light of De Merke Estates and M.K Dogar Limited assertion that Oxford City Council has not therefore gone far enough to meet its own housing needs, or its obligations under the Growth Deal, it is imperative that South Oxfordshire District Council take all reasonable steps under the Duty-to-Cooperate to properly address the unmet need in the HMA.

Housing provision is a key determinant in attracting and retaining people to support the economy of the City, and the wider region.

The current shortage of housing in Oxford also has environmental and social impacts, such as the congestion on roads around the city caused by employees travelling into the city to work, a worsening affordability and constrained growth of the local economy.

South Oxfordshire District Council has agreed to support Oxford City in meeting their unmet housing needs to 2031, in accordance with the timescales of the Oxfordshire Growth Deal.

In September 2016 the Oxfordshire Growth Board considered a Memorandum of Cooperation between each of its Members which sets out an amount of housing for each authority to plan for. In this respect the agreement apportioned 4,950 dwellings to South Oxfordshire to be met between 1 April 2021 and 31 March 2031.

The Council considers at paragraph 4.27-4.28 of the Local Plan that it can meet the full 4,950 homes and does so through allocating an additional 3 new strategic sites on the edge of Oxford city, as follows:

- Land South of Grenoble Road (Policy STRAT 11);
- Land at Northfield (Policy STRAT 12); and
- Land north of Bayswater Brook (Policy STRAT 13).

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Whilst this approach is supported in principle, the reality is that it fails to deliver the terms under the Memorandum of Cooperation and as such, fails the Duty to Co-operate.

This is because, the proposed strategic allocations do not meet South Oxfordshire's apportionment of Oxford's unmet housing need in full, or propose to deliver it within the timescale set out in the Growth Deal, namely by 2031.

Policy STRAT 11: Land South of Grenoble Road allocates 1,700 dwellings to come forward up to 2034 with the remainder, up to 1,300 dwellings, beyond 2034.

Policy STRAT 12: Land at Northfield allocates 1,800 dwellings up to 2034.

Policy STRAT 13: Land north of Bayswater Brook allocates 1,100 dwellings up to 2034.

Accordingly, this equates to a total of 4,600 dwellings up to 2034 to help Oxford meet its unmet need, compared with South Oxfordshire's commitment to take on and meet 4,950 dwellings towards Oxford's unmet need of 15,000 by 2031.

Consequently, the Local Plan needs to ensure that:

- these strategic allocations are capable of coming forward early within the plan period so that completions on the ground can be delivered by 2031 in accordance with the Government's Growth Deal timescales; and
- sufficient sites have been allocated to meet in full Oxford City's unmet need of 4,950 dwellings.

Furthermore, there are unresolved matters relating to the deliverability of each of these sites, and inconsistencies in decision making given that the sites comprise contentious green belt sites with no standard methodology for assessing the performance of land against the established Green Belt purposes.

This is highlighted by the differences in approach taken by LUC who have prepared a review covering the totality of the Green Belt looking at 13 Broad Areas and the individual Oxford City Green Belt Studies.

It is clear that the outcomes of the Council's Green Belt assessment process is being relied upon in determining key strategic decision on Green Belt release and allocation of sustainable and much needed housing to support the City's growth. However, in the absence of no standard methodology amongst the Authorities this represents a fundamental failing in the evidence base and strategic decision making.

I trust the above is of assistance in formulating the Local Plan for South Oxfordshire, in the meantime should you have any queries or require any additional information then please do not hesitate to contact me.

Yours sincerely



AMANDA SUTTON  
**DIRECTOR**

