

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="Ms"/>
Full Name	<input type="text"/>	<input type="text" value="Deirdre Wells"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Chartered Planning Consultant"/>
Organisation (where relevant)	<input type="text" value="Greenland Henley Ltd"/>	<input type="text" value="Red Kite Development Consultancy"/>
Address Line 1	<input type="text" value="c/o Agent"/>	<input type="text" value="Redlands Wing"/>
Address Line 2	<input type="text"/>	<input type="text" value="Maidenhead Court Park"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text" value="Maidenhead, Bertkshire"/>
Postcode	<input type="text"/>	<input type="text" value="SL6 8HN"/>
Telephone Number	<input type="text"/>	<input type="text" value="01628 773095"/>
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.

The Plan is Unsound because the allocation of 156 new housing units to Henley in Policy H3 is insufficient to address the recognised acute local need for Affordable Housing during the Plan period, a stated objective of the Plan.

1.01 Background evidence includes the Settlement Hierarchy Assessment, updated in December 2018, which states:

- 'We have focussed on factors that give the most accurate picture of a places' sustainability suitability for growth.'

1.02 Henley is top of the hierarchy, with a score of 978 confirming it is the most sustainable market town location for growth in the District, on a Policy-off assessment i.e. having no regard to constraints such as AONB. This score is significantly higher than the other 4 towns in the District (Didcot, Thame and Wallingford) on the same basis. (Appendix 6 Settlement Assessment).

1.03 Evidence confirms that housing affordability is a serious problem in the District as a whole (SHMA), and at Henley, it is recognized in viability studies that market values are significantly higher than elsewhere in the District. During the Core Strategy process, the Council based an allocation of 450 or more homes to Henley on the basis of the then current Housing Needs Assessment (HNA):

- Information that sufficient sites were available, suitable and deliverable and
- A minimum of 450 were required to deliver the urgent need for at least 150 Affordable units in first 3 years of the Plan

It is clear that the need for AH is an annual rolling requirement as new entries join the waiting list and supply throughout the Plan period is desirable, not only for a short initial period.

1.04 The same factors remain relevant in this new Local plan, as confirmed in the Housing topic paper 2019:

4.20. The SHMA based its affordable housing need on assumed continuation of the previous planning policies of sites providing 40% affordable housing in South Oxfordshire, and therefore lends support to the proposed continuation of this approach, since the overall number of homes needed is partially driven by the assumption of 40% affordable housing.

1.05 The Henley and Harpsden Neighbourhood Plan was carried out in a positive manner, and allocated sites for 500 units, exceeding the minimum requirement set out in the Core Strategy. Records show that the combination of (unanticipated) new Permitted Development Prior approval (COU) schemes, small infill, a few allocated sites and appeal decisions where planning permission has been granted in the light of shortfalls in HLS in the wider District have actually delivered more than was expected in terms of absolute numbers, despite some allocated sites remaining undeveloped at the time of writing.

1.06 What has been a signal failure however is the delivery of much needed affordable housing. Evidence given by the Council on appeal in late 2018 (APP/Q3115/W/18/3203476) confirmed that only 36 AH units had been provided in the previous 5 years, substantially below the level of need identified.

1.07 Sites allocated in the HHNP which were intended to deliver at least 150 Affordable Units (based on the HNA evidence available in 2010) have singularly failed to achieve. This has been acknowledged in the Inspectors report on APP/Q3115/W/18/3203476 issued in December 2018, an extract of which is provided below:

11. The Housing Needs Assessment (HNA) explains that Henley is the least affordable area in the District for both home ownership and rented housing. It suggests there was a potential demand for around 150 affordable homes over the three years following publication of the Core Strategy. According to the officer report, only 36 dwellings have been delivered over the past 5 years, equating to only 7 units per year. This is substantially below the level of need set out in the HNA.

12. Furthermore, I am told that the number of relets each year in Henley is low in comparison to other towns in the district, and bidding through the Council's choice based lettings scheme is always strong. At the time of the officer report being written there were 199 Henley residents on the Housing Register, of which 74 were in priority need. This is indicative of an acute need for affordable housing and may help to explain the under representation of 16 to 29 year olds in the area.

1.08 The Council has been unable to supply me with a copy of the up to date HNA, but the evidence given in the above appeal confirms that an acute need continues. The Aspinall Verdi Viability Study (2019) confirms however that even allowing for a potential substantial uplift in CIL rates in postcode RG9 (Henley), all sites to be allocated in the HHNP in accordance with Policy H3 will be viable with 40% affordable housing. CIL increases will of course have no impact on the supply of new Affordable Housing in Henley. The Henley market area is addressed separately in the above Study because of the exceptional high values in this specific area.

1.09 So why has Affordable Housing not been delivered in accordance with the Core Strategy? It appears that this is a direct result of several factors, principally:

1. the scale of numerous developments granted planning permission falling below the NPPF threshold of 10 units (this threshold was introduced after the Core Strategy had anticipated sites of 3 net gain would be liable for AH delivery or contributions)
2. the Council decision to allow C2 development on allocated housing sites with no consequent affordable provision
3. a large part of the supply having arrived via Prior approval COU (without any AH provision)
4. Development approved has included brownfield sites with higher development costs and values

1.10 Thus new high value market dwellings and C2 units for older people have been delivered, but very few affordable units. Further investigation prior to the EIP will hopefully establish whether the 36 units delivered have been social rent/affordable rent for those in greatest need, or intermediate housing for those who can afford 80% of market value.

1.11 The well being of the local economy and community in Henley rely on a workforce which includes (inter alia) lower paid jobs in retail, tourism, health, care and education sectors, which generally includes a high proportion of younger workers. While parts of Henley are accessible by public transport, the distance to other towns which are able to provide AH is considerable, with associated high travel costs for commuters. To continue to function successfully, Henley needs a local supply of affordable housing for families and young single people/couples who are essential to the local economy. This acute affordability problem applies to Henley more than the other market towns, and a special approach is justified.

1.12 Evidence strongly suggests that the urgently needed AH can only be delivered on larger greenfield sites allocated through the Neighbourhood Plan process. The current allocation of only 156 additional houses to Henley in Policy H3 will add at best 60 units over the period up to 2034 or around 7pa. Based on the performance of HHNP allocated sites in the immediate past, the delivery is likely to be far less, unless the overall requirement is raised significantly.

1.12 While the Neighbourhood Plan could choose to exceed any Local Plan Policy requirement, it is very unlikely that any significant uplift would receive sufficient public support to deliver a made plan. But a significant uplift is what is needed. It is thus essential that the Local Plan Policy H3 sets a higher requirement than 156 as at present.

1.13 Henley is identified as the most sustainable settlement in the District. The presence of AONB designation places constraints on growth, but the evidence available in the Landscape Capacity Assessment (LCA) is that suitable larger sites (those which would trigger 40% AH) are available to deliver a total of 470 new homes, based on an assumption of very low densities of 25dph. The table below summarises the evidence from the LCA, referring only to sites which:

- survived Stage 1 assessment and
- progressed to Stage 2, then
- were recommended for consideration for development and have a capacity for more than 10 (triggering AH provision)
-

SITE REFERENCE	LOCATION	CAPACITY AT 25DPH
HEN 1	Drawback Hill	105
HEN 2	Gillotts School	150
HEN 3	Tree Tops	20
HEN5	Highlands Farm	130
HEN10	Henley College	40
HEN19	Swiss Farm	25
TOTAL		470

1.14 The LCA does not consider sites within the town outside the AONB. Generally those sites known to be available for redevelopment for housing have already been identified in the HHNP1, but it is possible others might come forward in response to the Call for Sites (closing April 2019) and add further sustainable opportunities.

1.15 The LCA also does not consider land in Harpsden and close to Shiplake which would also come within the scope of the HHNP and potentially increase sources of supply.

1.16 There is therefore a reasonable expectation that sites at Henley large enough to trigger a 40% AH requirement can comfortably deliver around 300 homes in total (including 120 affordable units). This would balance the acute need for affordable housing with other policies in the Plan and recognize the special circumstances in the Henley market area.

1.17 If densities are lifted as proposed to 50dph (Policy STRAT 5), these sites have capacity for up to 900 new homes without extending development areas/ having a greater impact on the AONB. It is acknowledged however that site specific landscape sensitivities might constrain achievement of these higher densities, so no suggestion is made that a much higher requirement is chosen. A conservative approach is therefore recommended in relation to setting a new requirement in Policy H3.

1.28 Affordability and the need for accommodation for low income younger people is the most pressing problem in Henley and is extremely unlikely to reduce in importance during the Plan period. The current Policy will not deliver what is needed, is unsound and should be revised upwards.

(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.

RECOMMENDATION

The Plan should be Modified to increase the housing requirement for Henley to at least 300, to allow flexibility for a significant uplift to 120 units in the delivery of AH over the Plan period.

(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:

18th February 2019

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

X

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.**

Request: The Evidence Base should include an up to date Housing Needs Assessment to demonstrate an accurate/factual basis for Policies which aim to deliver affordable housing.

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).

Please return this form 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.