

**Norman Guiver - Comments on South Oxfordshire Local Plan 2011 - 2034 January 2019 Final Publication 2<sup>nd</sup>**

Page/para	soundness	Comment or change required
13/1.27	Not in accordance with Statement of Community Involvement (SCI)	The Publication version of the plan published in October 2017 had a very different strategy to this submission plan, the number of homes planned for in 2017 was considerably less and no homes were planned the edge of Oxford. The community, particularly those living around Oxford, has not had the opportunity to comment on or meaningfully influence the direction of the plan on these matters. This is contrary to the aspiration of the SCI.
20/3.7 28/STRAT 1 32-33 /4.24-4.29	Not positively prepared, justified or consistent with national policy	<p><b>Oxford unmet need and Green Belt allocations</b></p> <p>1.The location, scale and cumulative impact of proposals for 6,500 homes in the south Oxfordshire Green Belt on the edge of Oxford will have a significant impact on the setting of Oxford. Taken together with proposals in the other districts the proposed encircling of Oxford with new development outside the ring road will result in significant urban sprawl detrimental to the approaches to this important historic city. The cumulative impact was not assessed in the joint Growth Board work and has not been properly assessed in this plan.</p> <p>2.There are no exceptional circumstances to justify removing this sensitive land around the edge of Oxford from the Green Belt. This is inconsistent with national policy in section 13 of the NPPF. (It is acknowledged that the Green Belt sites at Culham and Berinsfield are justified on different circumstances to those around the edge of Oxford).</p> <p>3.The housing Topic Paper at para 2.28 explains that the housing requirement for South Oxfordshire is 775 per annum or 17,825 in total in the plan period 2011 to 2034 and that to assist in meeting Oxford’s needs is 495 per annum or 4950 in total over the ten year period 2021 to 2031.</p> <p>4.It also explains that the unmet needs for neighbouring authorities should be calculated using the new standard method in the Planning Practice Guidance, and that using this calculation method Oxford’s needs have already been met by Oxford and the allocations made in the other rural districts. So in fact no further allocations are actually required in South Oxfordshire.</p> <p>5.The council suggests at para 4.27 that it can meet the c 5,000 additional homes for Oxford’s unmet need. This is however only by releasing GB land around Oxford, contrary to NPPF. The Oxford unmet need requirement arises partly from Oxford’s desire to protect their own GB from development, it is not reasonable to agree the release of South Oxfordshire Green Belt land in order to</p>

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		<p>protect Oxford City's Green Belt without a clear assessment of both options.</p> <p>6. Oxford's housing need based on the standard method is much lower than the Local Plan target of 1400 homes per year, the very significant uplift is based on an assessment of affordability only within Oxford City boundaries. However as more than half their need is to be met through housing delivered outside their boundary, the assessment of affordability should be based on a county wide affordability assessment. It is not reasonable to use just a City affordability ratio. Using a wider affordability calculation would reduce the need considerably.</p> <p>7. The densities used to calculate housing delivery on allocated strategic sites and other sites in the plan and on committed sites not started do not reflect the densities set out in STRAT 5 as explained below under meeting housing needs. Housing delivery will be greatly in excess of the housing figures given.</p> <p>8. Sufficient homes are allocated in the submitted South Oxfordshire Local Plan to meet the South Oxfordshire housing requirement (17,825) and in fact to meet some of Oxford's unmet needs (if that is still felt to be appropriate) without allocating any land around the edge of Oxford in the Green Belt. A change of circumstances in Vale of White Horse also means that additional land at Dolton Barracks is to be released, this is close enough to the City to assist in meeting City needs. Exceptional circumstances for these allocations have not been made.</p>
22/Obj4.1 25/4.5 165/7.33	Not positively prepared, justified or consistent with national policy	<p>1. The scale of the proposals which significantly exceed the calculated requirement are likely to result in out-commuting and development which is way beyond the capacity of supporting infrastructure and are unsustainable.</p> <p>2. The Water Cycle Study notes at paragraph 3.2.4 a significant future shortfall in water supply in the Thames Water area. Long term plans call for an investigation of large scale resource schemes which would supply additional demand from the mid-2020s.</p> <p>3. Paragraph 4.2.3 indicates that the Thames Water supply region is an area of 'serious' water stress. The whole of South Oxfordshire with the exception of Henley falls in the SWOX zone and this is expected to have a daily deficit of 21MI/day by 2030. The updated reports confirm that strategic water infrastructure will be required for all the edge of Oxford sites. This strategic infrastructure has not yet been planned or included in the SWOX future work schemes.</p> <p>4. It is hoped that other necessary transport infrastructure will be funded by the government's growth deal, however the money has not yet been committed to the county and the county will need to subdivide funds between projects depending on their priorities.</p>

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		<p>There is inadequate commitment to funding to support the large over-allocation proposed.</p> <p>5.The funding and delivery mechanisms for other smaller but important infrastructure projects have not been identified, for example expanding health and education facilities. The cost of all these needs exceed the anticipated CIL receipts.</p>
21/Obj1.1	Not positively prepared or consistent with national policy	Add the word sustainable .....the <b>sustainable</b> growth and development of Didcot Garden Town, the delivery of <b>sustainable</b> new development in the heart of the district, and the <b>sustainable</b> growth of our market towns and the vitality of our villages.
22/Obj 3.7	For clarity	Our historic environment is particularly important for visitors, add historic and reference our nationally important built environment, change to By protecting our <b>historic</b> , built and natural assets, such as the Thames <b>and our historic market towns</b> , .....
25/4.3 30/4.15	For clarity	South Oxfordshire has not agreed to meet <b>all</b> the needs arising from Oxford City only to assist in meeting some of those needs, change to: ... for South Oxfordshire as well as <b>all assist with meeting</b> the needs arising from our neighbour Oxford City <b>where it is reasonable to do so.....</b>
26/4.6		This paragraph does not explain the rationale for the strategy well. Historically growth and investment in services has focussed on existing settlements in South Oxfordshire. It is agreed that Henley, Thame and Didcot are on the periphery of the district, this is just a factor of where the boundaries were drawn. There has not been a <b>reduction</b> in development in the heart of the district.
28/STRAT1 30-34 /4.15-4.33 35/STRAT2	Not positively prepared, justified or consistent with national policy	<p><b>Meeting Housing needs</b></p> <ol style="list-style-type: none"> <li>1. There are a number of issues with the justification for the chosen level of housing for the housing requirement.</li> <li>2. The housing Topic Paper at para 2.28 explains that the housing requirement for South Oxfordshire is 775 per annum or 17,825 in total in the plan period 2011 to 2034. This figure derives from the Oxfordshire SHMA which covers the period 2011 to 2031. The SHMA figures assessed demographic needs including an allowance for past under-delivery and for meeting needs from ambitious economic growth projections, the higher figure was used. For South Oxfordshire this gave a figure of 749 homes a year. The SHMA provided a range for the housing number of 725 to 825. The council has decided however to use the midpoint of the SHMA assessed figure on the basis that this was accepted for Cherwell and West Oxfordshire Local Plans, the difference in their cases is that the midpoint matches their economic growth requirement fairly closely as Figure 15 in the SHMA summary document shows. It may be more appropriate in South Oxfordshire's case to use the economic need figure as housing above this level is likely to result in out-commuting which is unsustainable.</li> </ol>

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		<p>3. The figures have been extended for 3 years to provide a figure for the 15 years of the plan period however there is no evidence to support the final three years as suggested in para 4.24. It may be more appropriate to use the ONS projections alone for the final three years as this is the only evidence available.</p> <p>4. Whilst there may be some justification for allocating sites for more housing than the district's housing requirement the importance of understanding the appropriate requirement is for use in calculating the 5 year land supply figures.</p> <p>5. Para 2.28 goes on to explain that Oxford's housing needs calculated using the standard methodology have already been met so this does not provide a justification for increasing South Oxfordshire's housing requirement. In addition that in order to help meet the Oxfordshire Growth Deal South Oxfordshire should provide 21,761 homes. As the council has already agreed with the other Oxfordshire authorities to the growth deal there could be some justification for providing for this level of housing, it would also provide for a level of contingency to meet assessed housing requirements and could provide additional choice in meeting Oxford's needs. It should not however be the level of the assessed housing requirement and there is no justification for the housing delivery or requirement to be higher than this figure.</p> <p>6. 21,761 homes will already exceed infrastructure capacity, government support for infrastructure to support a higher level of housing has not been given, in addition significantly exceeding the calculated requirement is likely to result in out-commuting. Higher levels of housing would not be sustainable and would be contrary to the policies in the NPPF.</p> <p>7. Policy STRAT 5 was only included in this latest version of the plan but housing numbers on allocated sites have not been recalculated. If the densities set out in STRAT 5 are used on all strategic and other sites and on committed sites not yet started housing delivery will be greatly in excess of the numbers set out in the plan. If it is assumed that densities on previously committed sites were calculated at 25dph as set out in the core strategy and those on sites allocated in this plan at 30dph as set out at policy DES 8 then housing numbers will increase to:</p> <p>Didcot 3,272 increases to 9,161  Wheatley 300 increases to 540  Wallingford 555 increases to 1110  Berinsfield 1700 increases to 3060  Culham 3,500 increases to 6,300  Chalgrove 3000 increases to 5,400</p>

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		<p>8. It is not clear why the plan seeks to deliver such significant growth above the identified requirement (28%) and beyond the plan period, in total 30,126 homes are planned for. Growth proposed above identified requirements and beyond the plan period appears to predetermine what happens beyond the existing evidence base without any relevant and up to date evidence to support those proposals. As a significant proportion of the housing proposed is in the Green Belt, the lack of evidence to support the housing numbers beyond the housing requirement also undermines the exceptional circumstances justification.</p> <p>9. It is acknowledged that the plan will need to be reviewed and updated within 5 years (NPPF para 33), there is therefore no need, evidence or justification for such a substantial over-allocation.</p>
29/4.12-4.14	Not positively prepared or consistent with national policy	<p>The settlement hierarchy looks at the existence of facilities but not their outstanding capacity. For example: Health services in Wallingford are close to capacity and the medical practice operates from a very constrained site. No solution has yet been found that is acceptable to SODC for expanding the medical practice. This is now at such a critical point that the CCG are raising objections to all new major development. Allocating further development to areas dependant on the Wallingford medical practice without resolving this issue is not a sustainable option.</p> <p>Suggest adding to para 4.14 <b>We will support proposals in these more sustainable locations provided proposals meet with policies in the development plan and that there is sufficient capacity at local essential facilities or that this can be provided locally through the proposal.</b></p>
41/STRAT5 4.56	Not positively prepared, justified, consistent with national policy	<p><b>Housing Density</b></p> <ol style="list-style-type: none"> <li>1. These density requirements are too high to be rolled out universally across settlements, they need to make allowances for the location of the sites and character of surrounding areas. The densities suggested would not allow for sustainable development or development which respects the character of local areas.</li> <li>2. Neighbourhood groups may have different views about how they wish to see their neighbourhoods develop, this policy is too prescriptive and would not enable neighbourhood groups the flexibility provided for in the Planning Practice Guidance.</li> <li>3. No definition of net and gross densities has been provided to understand the implications of this policy better. On enquiry with SODC it appears that the net densities in the examples used has been calculated using just the houses and gardens in fairly small example areas. A more usual definition includes local roads, off-street parking areas, small areas of amenity land and play spaces.</li> </ol>

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		<p>4. The evidence for this policy sits within Appendix 2 of the Housing Topic Paper and is particularly misleading for the reason set out above. No plans are included showing the areas over which the example densities have been calculated. Without this it is not possible to see how the comparator densities have been arrived at and whether they are realistic given the character of the area.</p> <p>5. Where new development is taking place within existing settlements a material consideration is the character and appearance of the locality. Where sites are likely to have an impact on the historic townscape or wider landscape at settlement edges including the AONB consideration needs to be given to this. Buildings will need to have appropriate heights and massing and there should be suitable landscaping. This is not necessarily compatible with the densities proposed.</p> <p>6. The policy is incompatible with policy DES 8 which sets a minimum density of 30 dwellings per ha, it is not clear how such a dramatic change in proposed densities has arisen and how it is justified.</p> <p>7. The policy will increase housing on committed sites well above the 15% growth levels proposed for towns and villages. This is misleading to residents and infrastructure providers and contrary to the Plan's proposed strategy.</p> <p>8. Densities on major developments in the last 5 years have generally not achieved densities anywhere close to those proposed in this policy. Whilst it is appreciated that increasing densities may achieve efficiencies in the use of land, the plan aims to supply a range of house types and sizes to meet the needs of a wide range of people wishing to move within and to South Oxfordshire. This policy is too prescriptive and will not achieve this aim.</p>
88/5.14	To aid clarity	<p>This section is confusing. The Plan indicates that market towns should take 15% growth in addition to core strategy requirements. Table 5d sets out the figures showing a total requirement of 3873 in column 1.</p> <p>Para 5.16 indicates that each market town neighbourhood plan will need to assess whether there is capacity to support the exact number identified for each town. The SODC assessment of capacity was very high level. This implies that it is the composite number that is the overall requirement and that there may be some adjustment in the numbers for each town, in fact Policy H3 follows this approach. Column 2 shows that 3715 homes have already been committed or delivered leaving an outstanding requirement of 158.</p> <p>It is not clear therefore why the outstanding requirement is shown as 519 homes, 156 for Henley and 363 for Thame, and what will happen if these numbers are not met. Will applications for housing be supported even if the composite requirement has been met?</p>

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90/518 – 5.32	To aid clarity	<p>This section is very confusing.</p> <p>The Plan indicates that larger villages should take 15% growth in addition to core strategy requirements. Table 5f sets out the figures showing a total requirement of 3967 in column 1.</p> <p>Para 5.30 indicates that some villages are constrained and that other unconstrained villages will need to plan for more growth to compensate. This suggests that the 3967 is a composite figure for all villages to meet, earlier iterations of the plan were phrased in this way. Part 2 of Policy H4 also explains that the plan has allocated sufficient sites.</p> <p>Column 2 shows that 4,086 homes have already been committed or delivered ie in excess of the required number already.</p> <p>It is not clear therefore why there is an outstanding requirement for any of the villages and what will happen if any village in the list in part 1 of Policy H4 does not meet their outstanding requirement. Is there still a commitment on all villages to help meet the further 499 homes specified in part 1 of the policy?</p> <p>What does the asterisk text mean under part 2 of the policy?</p> <p>The number of homes in the list in part 1 of the policy adds up to 545 not 499, should this be corrected?</p>
99/H9(v)	To aid clarity	What are the required standards and where are these set out?
101/Policy H10	Not consistent with national policy	This policy does not appear to fully accord with para 77 of the NPPF which indicates that some market housing can be provided on exception site housing to make it viable.
126/6.17	To aid clarity	Berinsfield is not shown to be in Science Vale area of influence on the plan in Appendix 6, should it be included or should this paragraph be changed?
130/EMP3 and supporting text	To ensure departures from the plan are properly justified.	In many cases employment land loss to residential has included replacement employment land as part of a mixed scheme. Where this happens the employment units are frequently marketed as vacant land without the units being built. In these circumstances the one year marketing seems inadequate. Most businesses seeking smaller premises would want to be able to move relatively quickly, it is likely to take much longer to find a business willing to wait for the building to be constructed.
131/EMP3 (6)		How will the information be used to determine planning applications?
133/EMP7	To aid clarity	Planning permission has been granted for 3.1ha of land at Hithercroft, the Employment background paper makes clear that this is the intended allocation for the 3.1ha. It is not clear why this site is not added to the list in policy EMP7 rather than requiring that it is allocated in the WNP.
154/TRANS 3	To ensure the plan is positively prepared and consistent with national policy.	<p>Further essential infrastructure is required.</p> <p>In view of the scale of development agreed at Wallingford and Crowmarsh Gifford (around 1500 homes) and the fact that the station car park at Cholsey is already beyond capacity with parking all around the village, improved provision should be made. This should include a safe cycle route from Wallingford to Cholsey and an extension to the station car park.</p>

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179/ENV7	To ensure consistency with national policy	This policy should include a section on proposals which cause less than substantial harm to better reflect national policy as is included in the other heritage asset policies. It would be helpful to have an explanation of national policy in relation to the two categories in the lower case text or link to where details can be found.
191/EP4(3)	clarity	... In flood zone 1, a <b>SSFRA</b> should accompany all proposals involving: ...
205/DES8	To aid clarity	This policy appears to duplicate requirements in other policies in particular on density and air quality. The density requirement is more appropriate for rural areas than that expressed in Policy STRAT 5.
208/DES 9	To aid clarity	This policy appears to duplicate requirements in other policies , for ease of understanding its requirements should be added to those other policies or to their supporting text. Bullet 3 should be more positive.
215/TC2	To aid clarity	It is not clear why a distinction is drawn between major town centre and town centres as the remainder of the policy does not draw any distinction between the two. Bullet 4 – it would be helpful to have examples of complementary uses non-complementary uses. It may also be appropriate to identify a limit on the proportion of complementary uses which might be acceptable. There will surely come a point when centres could be so dedicated to complementary uses that their prime retail function is lost. This would make towns less sustainable places. Bullets 6 and 7 should come before bullet 5 if they relate only to town centres – it is not clear what is meant by ‘these centres’ in both bullets.
215/10.9	To aid clarity	Didcot and Henley will not be in competition with Thame for trade, if Thame residents need goods and services not available in Thame they are likely to go to other centres outside the district.
217/TC3	To aid clarity	Bullet 2 uses the concept of smaller town centres which is not defined, it would be better to say Henley, Thame and Wallingford. However bullet 3 seems to be saying that there is no need for further comparison goods floorspace in these three towns so bullet 2 is irrelevant.
219/TC5	To aid clarity	It is not clear whether this policy is compatible with policy TC2 which indicates that complementary uses are acceptable in town centres. The two policies should possibly be drawn together to make this clear. Is it suggesting that complementary uses are only acceptable in town centres outside the primary shopping frontage, if this is the case it should be clarified in TC2 or do complementary uses need to undertake the marketing exercise before they will be supported?
CF4(ii)	clarity	If land is retained in sporting use it is not clear why it is necessary to demonstrate that the need for the new facility outweighs the loss of the old use. This is not necessary
Appendix 14	Not consistent with NPPF	The large number of policies identified as strategic policies does not support neighbourhood plans being able to shape the development and growth of their local areas. The density policies (STRAT 5 and DEAS 8) in particular are over-prescriptive and would preclude

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		<p>neighbourhood groups from identifying a shared vision and developing design principles for their local area as set out in the NPPF. It will also preclude neighbourhood plan groups from shaping the development and growth of their local area, in particular to have their say on what buildings should look like as set out in Planning Practice Guidance paras 002 and 003.</p> <p>Neighbourhood plan examiners have already agreed that density is not a strategic matter in agreed plans, for example at Cholsey.</p> <p>The format of Appendix 14 makes it difficult to identify strategic policies since it does not flow in plan order, it is possible that some policies are not classified at all. In addition some policies contain both strategic and non-strategic matters.</p> <p>It is suggested that Strategic policies should be limited to STRAT policies excluding STRAT 5.</p> <p>H policies 1 to 15 excluding H8</p> <p>EMP policies 1 – 9 excluding EMP 2 and only including EMP 3(i)</p> <p>INF 1</p> <p>Trans 1a to 3 and Trans 6</p> <p>ENV1- 9 excluding ENV5</p> <p>TC1 and TC4</p>