

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" value="Mr"/>	<input type="text"/>
Full Name	<input type="text" value="Andrew Birch"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Regional Director"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Hallam Land Management"/>	<input type="text"/>
Address Line 1	<input type="text" value="Unit 2 Apex Court"/>	<input type="text"/>
Address Line 2	<input type="text" value="Woodlands"/>	<input type="text"/>
Address Line 3	<input type="text" value="Bradley Stoke"/>	<input type="text"/>
Postal Town	<input type="text" value="Bristol"/>	<input type="text"/>
Postcode	<input type="text" value="BS2 4JT"/>	<input type="text"/>
Telephone Number	<input type="text" value="01454 625532"/>	<input type="text"/>
Email Address	<input type="text" value="[REDACTED]"/>	<input type="text"/>

For information on **sharing your details**: please see page 3

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:

STRAT 1

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.

See page 4

(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.

In conclusion:

1. the release of strategic sites abutting the built up area of Oxford to meet Oxford city's needs is supported - subject to further representations regarding the effectiveness and justification of the scale of provision made for such releases - in particular the need to increase the provision made at Land north of Bayswater Brook – to include land owned by both New College and Lincoln College, which in turn helps to facilitate an A40 link road;
2. rather than an unfocused and contradictory series of elements to the strategy the most sustainable options for accommodating development across the District should be prioritised. Specifically:
 - the role of Didcot is supported and emphasis could be given to further seeking to maximising its potential as a Garden Town. In this regard Hagbourne Fields, and surrounding land as a potential location for development presents a more sustainable option consistent with the Local Plan Strategy than do a number of the strategic sites in heart of the District;
 - the potential of the market towns (in particular Thame) as sustainable locations for growth as a means of long term investment in those communities - with suitable and available sites for development - should be positively recognised and supported and prioritised.
 - proposals for growth at Chalgrove, Berinsfield and Culham should be reconsidered - both in principle and in terms of the disproportionate emphasis and wholly unrealistic expectations placed upon them to meet the housing and infrastructure needs of the District.

(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: Date:

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.**

STRAT 1: The Overall Strategy

It is considered that the overall strategy is unsound, being:

- not justified
- not effective
- inconsistent with the delivery of sustainable development in accordance with the NPPF.

Not justified

Over the long gestation of the preparation of the Draft Local Plan there have been significant changes to the strategy that is now pursued. The changes that have incorporated through the “evolution” of the overall strategy are documented in the District Council’ Draft Topic Paper - “Local Plan Spatial Strategy” (January 2019).

The process started with the historic strategy adopted in the South Oxfordshire Core Strategy - focussed on Didcot and the District’s three market towns.

The range of options that might form the basis of this Plan (including the historic Core Strategy approach) are summarised variously - not least in para 4.7 of the Plan. Such options were consulted upon and tested and subject to Sustainability Appraisal. The outcome - for the Council - was a clear preference to evolve the Core Strategy by focussing development also in the Science Vale and sustainable settlements (the town and the larger villages).

In reality the Local Plan Strategy has evolved away from this SA plus sustainable settlements and now comprises many disparate elements which are collectively unsupported by the evidence base (ignoring for now whether the strategy is either sustainable or effective). Moreover, the direction of growth to one element of the Strategy detracts from the achievement of other elements of the strategy.

Focus on Heart of the District

By way of example, the Local Plan Spatial Strategy Draft Topic Paper (January 2019) documents the outcome of consultation of the First Publication Local Plan - including the consultation outcome that the proposed spatial strategy set out in the First Publication LP was unsustainable and the focus on development within the “heart of the District” was a particular cause for concern (page 35). On page 36, “key areas of required change to the Spatial Strategy” were set out - reflecting consultation and the outcomes of the Council’s Site Assessment Background Paper. These include removal of “unnecessary reference” to the “strengthening the heart of the District”. In part that was to ensure that other elements of the strategy were not undermined in terms of their importance. In part it was to reflect the concerns that focussing on the heart of the District was not considered to be the most sustainable approach.

However, no revision to the Spatial Strategy occurred in this Second Publication Draft to respond to concerns and evidence regarding the inappropriate focus on the heart of the District. The wording is retained, as are the locations such as Culham, Chalgrove Airfield and Berinsfield that continue to reflect a commitment to direct development to towards the centre of the District, rather than a towards least harmful green belt locations and the most sustainable locations where there are potential development opportunities in locations such as Didcot Garden Town, Thame and the more justified green belt release sites allocated at the edge of Oxford.

Reliance on Strategic Sites

In similar vein, the Local Plan Spatial Strategy Draft Topic Paper noted that an outcome of the consultation exercise on the First Publication Draft of the LP, was “an overreliance on strategic allocations” (page 35). The Topic Paper recognises the need for a response to this and other concerns and suggests that the current Jan 2019 Plan identifies or revises the “principal aim of the Spatial Strategy...to promote growth at the Science Vale and sustainable settlements and this includes larger villages and market and other towns to enhance their function and the sustainability of those places”. The proposed response effectively down plays the role of strategic sites.

In actuality, the Jan 2019 LP places additional not less emphasis on Strategic sites as part of its spatial strategy.

We have no concern with the introduction of additional sites on the edge of Oxford to meet the specific requirement for Oxford Sub-Area. The sites at the edge of Oxford, with careful and comprehensive masterplanning (and so long as they are able to deliver the necessary infrastructure and long term green belt boundaries) have the opportunity to support the delivery of key infrastructure connections with neighbouring development and Oxford whilst supporting the regeneration of adjacent peripheral residential areas.

In contrast, the retention of Chalgrove, Berinsfields, Culham and the addition of Wheatley flies in the face of what was perceived (by SODC) to be a necessary change to the spatial strategy consistent with the consultation outcomes and evidence base. Yet all three sites (Chalgrove / Berinsfield, Culham) require significant infrastructure both before development may commence and to try and redress the poor sustainability performance of development in those locations.

In addition, following the Council's decision to reassess options for meeting the District's housing needs in the light of the large areas of uncertainty surrounding Chalgrove Airfield, the focus for assessing potential alternatives was very much on finding alternative strategic sites rather than on exploring the potential for other more sustainable elements of the Spatial Strategy.

The process of focussing on strategic allocations has excluded the growth potential for instance of the Market Towns that the strategy purports to support yet fails to do so. The means by which this bias towards strategic sites has arisen included:

- the Strategic Site Selection Process' application of a threshold of 500 dwellings and exclusion of sites when taken together which exceed this threshold (yet have growth potential - indeed strategic growth potential);
- potential strategic sites at the edge of market towns or villages with made or significantly progressed Neighbourhood Plans were explicitly excluded from the latest site assessment work. Whilst intended by SODC to avoid undermining the Neighbourhood Plan, it fails to provide an appropriate context for informing the spatial strategy and in turn future Neighbourhood Plan reviews.

In terms of the tests of soundness, the spatial strategy (especially the later stages thereof) has failed to properly recognise or consider reasonable alternatives to the strategic allocations. It's eye has only been on one prize - focus on strategic sites.

Market Towns

Not least because of the reliance on strategic sites in the Spatial Strategy, the approach taken towards the market towns is at best lukewarm in apparently directing development towards Thame, Henley and Wallingford. Its lack of focus and distinct underplaying of the role of the market towns, is contrary to the evidence base.

The intent of STRAT 1, we are advised by the Draft Spatial Strategy Topic Paper, is that "the principal aim of the spatial strategy is to promote growth at Science Vale and sustainable settlements and this includes larger villages and market and other towns to enhance their function and the sustainability of those places" (paa 35).

The actuality is that STRAT 1 does not do this. Instead it simply seeks to support the role of the market towns - apparently just through maintaining and improving the attractiveness of their town centres. The provision for jobs, homes, services and infrastructure appears to be seen only in this very limited context. The paucity of the policy commitment to Thame for instance is apparent in the feeble policy direction offered in Policy TH1 and the few sentences that precede it (4.134 to 4.137).

In terms of sustainability, the Settlement Assessment Background Paper 2018 prepared by the Council, places Henley, Didcot, Thame and Wallingford in a completely different league in terms of their sustainability scores - compared with the Larger villages. Yet the new dwellings to be allocated to the 3 market towns (excluding Didct) is virtually the same as in the larger villages and is just 40% of the planned level of windfall sites across the District.

For each of the Market Towns, SODC ignores the SHELAA (a key part of the evidence base) and makes crude assumptions for it growing by 15% above core strategy levels. Once commitments are taken into account just 363 new dwellings are envisaged by this Plan at Thame. Fewer in Henley. None in Wallingford.

Such a limited approach - the result of a lack of focus and clarity in the Spatial Strategy - betrays the opportunity to deliver the significant investment in infrastructure, community facilities, and quality of life at Thame as one example - and potentially in other market towns.

There is more than a feeling that the approach adopted is a reaction to “the historic focus of development to the periphery of the district...” and a counter reaction which remains in the Plan to direct development to the centre of the District (para 4.7).

Again, there is a failure in relation to the evidence base and reasonable alternatives. The Plan itself emphasises “as a vital part of our strategy ...understanding the nature of our towns and villages and how they relate and link with places outside of the District” (para 4.11). No serious attempt is made in the spatial strategy to do so - for instance to recognise the relationships between Thame and areas beyond the boundary of the District such as Haddenham and the strong and developing movement networks facilitating sustainable travel and sustainable relationships.

The evidence base is clear that the potential of the market towns as sustainable locations for development and as part of strong aspirations for the delivery of infrastructure in such locations, should be prioritised before focussing development at such locations as Chalgrove, Berinsfield and Culham.

Not Effective

The Spatial Strategy is also not likely to prove effective.

There is a separate issue concerning whether the Plan makes sufficient provision to meet the housing and employment needs of the District. Our concerns in respect of this are set out in relation to Policy STRAT2.

Even at the modest levels of provision set out in the Plan there are substantial concerns with regard to its effectiveness.

First there is the issue of whether this strategy - with its reliance on strategic sites - can deliver the numbers of dwellings that the Council anticipates. It is most improbable.

The time taken to deliver strategic sites as a generality has been extensively documented and will be debated at length - both in general terms and in relation to specific sites in the Examination into the SOLP.

The trajectory for the delivery of the sites is set out in Appendix 1.2 of the IDP. It is flawed in numerous respects including in particular:

- the expectation that the first strategic site - Berinsfield - could deliver 100 houses in 2023/24 - meaning that a start on site would be achievable less than 2 years from the most optimistic of expectations concerning the adoption of the SOLP;
- the expectation that five of the strategic sites will have delivered at least a years supply of housing by 2024/25 at the latest - i.e. five of the seven sites will have carved the most optimistic of routes through the planning, ownership, legal and technical issues to be resolved before commencement;
- the expectation that from 2026 onwards that the strategic sites will collectively be delivering a minimum of 1000 dwellings a year.

Such assumptions - at a general level (irrespective of the delivery issues associated with individual allocations) - are not credible.

The complexity of bringing forward strategic scale development in general is emphasised in the Plan (yet seems not to be reflected in the strategy). Policy STRAT4 sets out the need for comprehensive master plans embracing multiple landownerships and the weight of evidence and documentation that is necessary before any planning application can be made. Each of the individual Strategic Allocation policies highlights the substantial uncertainty that exists around such key issues as the number and phasing of homes and the timing of delivery relative to infrastructure prior to substantial additional work with uncertain outcomes. For instance, in STRAT 10 relating to Berinsfield (assumed to be the first to deliver new homes) the Plan states “The number and phasing of homes to be permitted and the timing of the housing delivery linked to the planned infrastructure needs to be informed by further evidence as per the requirements of other policies in the plan including Policy TRANS4...”. The same requirement is inserted in each of the STRAT policies relating to an individual Strategic Site. In short, we and the plan does not yet have the evidence base to provide any certainty as to the number, timing or infrastructure limitations relating to the delivery of any of the strategic sites.

The IDP demonstrates how extensive some of the infrastructure requirements are likely to be and the complexity involved in securing timely delivery consistent with the delivery of new homes.

The site specific policies of the SOLP further emphasise the difficult inter-relationships likely to bear on timescales for delivery e.g:

- realignment of B480 and new bypass at Chalgrove (STRAT7);
- timing of delivery of Clifton Hampden bypass, Thames Road crossing, A4074/B4015 Junction at Culham (STRAT9)
- road and regeneration investment at Berinsfield (STRAT10) etc

The ability to fall back on other sources of supply - if and when the delivery assumptions on the strategic sites fail to materialise - is extremely limited. As is apparent from Table 5c of the SOLP, 10,375 of the 12,739 new elements of housing supply assumed in the Plan are on new strategic sites in the plan period. Less than 20% of the new supply is from elements of the Strategy that are not strategic sites. The potential to take up the lack of provision on strategic sites is not addressed in the Strategy.

Second the reliance on strategic sites in the manner envisaged will call into question the ability to deliver the infrastructure necessary across the district. The complexity of delivering strategic sites and risk of delay, means that the strategy increases the risk of a failure to deliver on the infrastructure anticipated in the IDP.

The lack of aspiration in relation to uncommitted development outside the strategic sites will reduce substantially the ability to deliver new infrastructure at key locations outside of those locations- not least in the market towns. The "use" of extensive numbers of windfall to balance the books only serves to reduce the effectiveness of the strategy in meeting infrastructure needs (including affordable housing) across the District.

Third - - in relation to effectiveness, there is a concern that the strategy fails to be effective in meeting key environmental and sustainability objectives.

By seeking only to balance the GB releases on the edge of Oxford with the unmet Oxford City housing need, the effectiveness of the strategy in meeting the objective to ensure long term green belt boundaries and to prevent further harm to the Green Belt is not met.

By employing Green Belt releases elsewhere in the District (Culham, Berinsfield), unrelated to Oxford City's needs, unnecessary harm arises to the Green Belt in that location and to the permanence of the Green Belt as a whole.

Oxford's unmet needs

While supporting the release of Strategic Sites from the Green Belt on the edge of Oxford to meet Oxford's unmet needs, Hallam Land is concerned that the specific policies and individual site releases are not fully justified or effective. To this end Hallam Land Management has set out further detailed objections to Policy STRAT13 in relation to land North of Bayswater Brook - seeking a significant increase in the size of the strategic allocation.

In summary, and of wider strategic importance to STRAT1, each of the strategic sites must be capable of delivering the infrastructure necessary for their development and in the case of sites released from the Green Belt - be capable of ensuring the establishment of enduring Green Belt boundaries. The representations in respect of STRAT 13 reflect the existence of a group of willing and experienced landowners to deliver robust green belt boundaries and more important the transport infrastructure mooted in the policy but not delivered through the present allocation at STRAT13 - a new link road to the east of the allocation connecting to the A40. This is achieved through an enlarged allocation.

Of more wider concern in the context of STRAT1, the Local Plan obligation in respect of Oxford's unmet needs is to ensure the provision of 4,950 new homes between April 2021 and March 2031. This the Council proposes to do through the three allocations at Grenoble Road, Northfield and North of Bayswater Brook where it anticipates 4600 new homes plus 300 at Wheatley. There is no margin for error in the delivery of those sites if unmet needs are to be met at the appropriate time. The level of risk is increased by the reliance on the start and completion of two of those sites in the Plan period. Only in respect of Grenoble Road are completions envisaged beyond 2031 and then only 1300.

In the first instance Hallam considers that the overall level of provision in the strategic sites on the edge of Oxford is insufficient to provide any buffer if delivery lags in one or more of the allocations. Nor do the nature of the present allocations facilitate higher rates of delivery in meeting Oxford's unmet needs.

Also, there remain significant questions regarding the capacity (let alone delivery) of the other strategic sites (other than STRAT13) on the edge of Oxford - which would then need to be made up elsewhere (and no such reserve provision is envisaged in the Local Plan at present).

The planned release of Green Belt to accommodate strategic allocations must have a degree of permanence, with due regard to the NPPF. Hallam is concerned that the proposed releases of green belt to accommodate the proposed strategic allocations will not endure. The sites to meet the unmet housing needs of the city of Oxford are only intended to meet needs over the period on 2011-2031 and not towards the end of the plan period or beyond in accordance with the NPPF.

Beyond 2031 and indeed 2034, there will be a requirement to meet Oxford's housing growth requirements, which will continue, and this is only likely to become more acute with increasingly limited opportunities to meet the Oxford's needs within the city boundaries (e.g. through brownfield sites, intensification and other potential future windfalls). Future housing requirements must also be considered in the context of the Cambridge-Milton Keynes-Oxford Arc and the National Infrastructure Commission's finding that "rates of house building will need to double if the arc is to achieve its economic potential" (see Vale of Aylesbury Local Plan 2013-2033 examination: Interim Findings 29 August 2018, paragraphs 21-23. Already the Oxfordshire Plan 2050 is in preparation with initial consultation underway. The Plan is to be prepared quickly consistent with the Oxfordshire Growth Deal and should not need to make new green belt releases so soon after the adoption of the South Oxfordshire Local Plan to meet Oxford's unmet needs

The SO Local Plan instead essentially proposes a Green Belt change on the edge of Oxford that will endure for little or no more than 10 years and in plan making terms less than that.

A greater allocation at STRAT 13 will also deliver the additional benefit of creating more flexibility in the overall range of sites across South Oxfordshire and to support a more effective and sustainable spatial strategy and Green Belt permanence

Not Sustainable or consistency with national policy.

For many of the reasons set out above the Spatial Strategy also fails the key soundness test of ensuring consistency with national policy and in ensuring the delivery of sustainable development.

Locations such the market towns benefit from existing services, facilities and infrastructure, which would be significantly supported and enhanced with additional housing and employment land provision. Yet the potential is largely ignored as is the opportunity to think of such locations in terms of their relationship across the District Boundary.

Prioritising development at Culham in proximity to Abingdon promotes harm to Green Belt, with the adverse impact going beyond South Oxfordshire and into the Vale of White Horse. At present only 13% of Culham residents travel less than 5km to work, the increase in residents is going to increase out commuting and as the site is located to the west of the district residents are more likely to need to travel to work to Oxford/Vale of White Horse putting into question the sustainability of the site. In addition, the Strategic Site Selection Paper in respect of Culham states that "There will however be some delays to the delivery of the site with infrastructure needing to be in place to enable development to take place."

Likewise promoting development at Berinsfield and Chalgrove promotes unsustainable development and additional car-borne commuting, given the distance of that part of the District from significant urban centres. For example, Berinsfield has limited services and cuts to public transport has meant that busses no longer route through the village and Chalgrove has an extremely limited bus services, it would be naïve to believe that new residents would create a demand for a bus service, the reality is that people will commute by private car. Very few low proportions of journeys to work from Chalgrove are under 5km and in the sustainable transport strategy Chalgrove preforms the worst. In addition, Chalgrove is accessed by local roads and B-roads such roads are not conducive to cycling and walking.

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.