

# 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](mailto: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<br>(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"/>             |

## 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 2

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.

We advocate an increase in the level of housing provision to at least 18,975 dwellings, which would reflect the higher end of the SHMA for securing economic growth and the delivery of greater levels of affordable housing. This higher level equates to an annual rate of provision of 825 dwellings per annum.

Higher levels above 18,975 would also afford some flexibility to respond to the economic and housing growth implications of the Oxford Cambridge Expressway, which has already impacted on the progress with the neighbouring Vale of Aylesbury Local Plan. Such an increase will ensure the soundness of the Plan in respect of it being "positively prepared" and "justified" (para. 35 of the NPPF).

(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: 18/02/2019

### 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](http://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 2:South Oxfordshire Housing and Employment Requirements**

We strongly object to Policy STRAT2, particularly the element which proposes to make provision to meet South Oxfordshire's housing needs with 17,825 new homes. We do not consider that this level of provision is sound, as it does not adequately reflect core evidence set out in the Strategic Housing Market Assessment for adequately supporting the delivery of economic growth and the delivery of affordable housing.

It also fails to take into account future growth requirements that will emerge from the Oxford Cambridge Expressway and ARC.

In calculating the District's own housing need, the latest version the plan refers to the Standard Method as a starting point, where the requirement for 556 dwellings per annum (dpa) is considered to be the minimum.

In the supporting text the plan justifies the uplifted housing figure, drawing upon guidance in the standard method to justify an uplift

- where growth strategies are in place, in this case the Oxford Housing and Growth Deal commitment for 100,000 new homes between 2011 and 2031
- where strategic infrastructure improvements are planned, which for Oxfordshire includes £150m worth of infrastructure funding is secured for funding the first five years of the Housing Growth Deal;
- where an authority has agreed to take on unmet need, where South Oxfordshire has agreed to provide 4,950 additional dwellings over the district wide requirement;

The Plan then states that the Housing Growth Deal derives its housing target from the Oxfordshire SHMA propose a figure of 775 dpa. It therefore states that the growth Deal Commitment and the Oxfordshire SHMA are a sound justification for uplifting South Oxfordshire's housing requirement above the 556 dpa per year from the standard method.

We believe that this figure should be higher and set at 825dpa to reflect the highest point of the range suggested in the SHMA. An annual rate of 825 dpa would support Committed Economic Growth and better support the delivery of affordable housing, moving significantly towards the 965 dwellings per annum set out in the in the SHMA that is considered to be needed to meet affordable housing in full. The SHMA states in 9.60 that the higher end of the 725-825 range would support enhanced affordable housing delivery.

Taking account of rolled forward SHMA, objectives for economic growth at Science Vale, and enhancing affordable housing delivery across the District, we contend that housing provision should reflect the higher end of the SHMA range, which equates to 18,975 new homes in the District in the 2011-2014 period.

Reflecting the higher end of the SHMA would also afford the Local Plan some flexibility to respond to the growth implications that are more than likely to from the Oxford Cambridge Expressway and East West Railway, raising the ambitions for economic growth at Science Vale

Paragraph 18 of Topic Paper 2: Spatial Strategy supporting the emerging Oxfordshire Plan 2050 acknowledges that "emerging proposals for the Cambridge-Milton Keynes-Oxford Arc, including East West Rail and the Oxford-Cambridge Expressway could have implications on the amount, type and distribution of growth in Oxfordshire."

Proposals for the Oxford Cambridge Expressway, even in its early corridor options stage has already affected progress on the neighbouring Vale of Aylesbury Local Plan, which does not make an allowance for the effects of Cambridge-Milton Keynes-Oxford growth Arc in its housing requirement. Whilst the broad corridor for the east-west expressway is yet to be selected prior to the identification of a precise route, the government has a clear vision for this corridor and it is 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)

Whilst there are uncertainties over the routing of the Oxford-Cambridge Expressway, there is certainty that the South Oxfordshire will be affected by all the route options. There is also certainty that the proposal represents an upward direction of travel in rates of housing and employment growth that will be expected. For South Oxfordshire, an increase of the annual housing requirement from 775 dpa to 825 dpa would be modest in this context, of a potential doubling in economic growth. Nonetheless a higher rate would secure a degree of flexibility in supporting an increasing in the economic growth potential.

**Alternative formats of this form are available on request.** Please email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) or call 01235 422600 (Text phone users add 18001 before you dial).

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