

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"/>

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 5

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: Date:
(this can be electronic)

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 5: Residential Densities

We strongly object to Policy STRAT5. We are concerned that the proposed densities are exceptionally high and may not be achievable.

The proposed density represents a significant increase above the minimum density set out in Policy CSH2 of the Core Strategy which set out a minimum density policy of 25 dwellings per hectare (net)

Annual Monitoring Report 2017/18 states the average density on major developments permitted during 2017-18 was 29 dwelling per hectare, above the minimum density target of 25dph. An increase in densities above the averages achieved so far would represent a significant step change.

Previous, the Annual Monitoring Report 2011-2012 set out the proportion of dwellings completed by density in 2011/12. It shows that 63% of all completions were less than 30dph, whilst 9% of completions were 30 to 50dph, and 28% was above 50dph.

We accept that the Policy STRAT5 is seeking to be consistent with paragraph 122 of the NPPF in that it has set a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range, and that the densities across South Oxfordshire District Council (SODC) indicate an uplift. The Housing Topic Paper January 2019 however, fails to provide a robust reasoning for the specific minimum density standards.

The Topic Paper carries out a theoretical design led exercise by MJP Architects to demonstrate how developments of exceptionally high densities in excess of 70dph might be met, but they lack any context on the types of locations where they might be found, or how they could be achieved. The examples are theoretically design-led, blind of the context of any of the strategic allocations and other locations for housing growth. With proposals for 100% parking they also lack consideration of the rates of car parking provision that might be appropriate for locations to avoid the issues experienced in practice with car parking that are well documented in spacetopark.org.

The examples of existing higher density residential development that are referred to in Appendix 2 of the Housing Topic Paper January 2019 do not include any site plans to show their context and how net densities were calculated. They also fail to set out the car parking strategy in each case and whether such locations experience problems that are associated with restrictions on car parking provision.

Given the density statistics set out in the Annual Housing Monitoring Report for 2017/18 densities are substantially lower and if anything, appear to have reduced from levels recorded in the AMR 2011-2012.

Such exceptionally high densities on strategic allocations may directly contradict the provisions of Policy STRAT6, the final paragraph of which notes that: 'Where land is proposed to be removed from the Green Belt, new development should be carefully designed to minimise visual impact'.

We consider that densities would be best established on a site by site basis through development frameworks and more detailed master planning, based on a robust assessment of site features and the surrounding context. Such an assessment would place considerable weight on their relationship with surrounding built and natural features as well as their relationship with services and facilities and sustainable transport. This process would also represent good placemaking and avoid developments with inappropriate densities resulting in negative impacts however unintended.

Such an approach is more realistic for justifying both higher and lower densities we would expect Policy STRAT5 to reflect this approach.

Finally, if these optimistically high-density assumptions have been used to calculate the capacity of strategic allocations, we are concerned that housing, if delivered at lower densities to reflect site constraints, will fail to overall create a housing supply that is sufficient to meet housing requirements across the District.

We request that the Policy STRAT5 be amended to set out a general strategy towards density, referring to good practice and directing densities to be established to reflect a robust site assessment that fully considers their relationship with existing services and facilities and sustainable transport opportunities.

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).

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