

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 6

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. Alterations to Green Belt to allocate Strategic sites at Culham and Berinsfield should be reconsidered given their relative unsustainable locations, potential harm on Green Belt and compatibility with our preference for a more sustainable spatial strategy to focus development at Didcot and the Market Towns and Large Villages and the release of strategic sites at the edge of Oxford.
2. The release of strategic sites abutting the built-up area of Oxford to meet Oxford city's needs is supported as a matter of principle - 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 in accordance with the plan that accompanies reps on STRAT13. As proposed in the Plan at the moment the releases of green belt around Oxford are ineffective.

(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: 18/02/2019
(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 6:GREEN BELT

Hallam Land Management objects to the proposed alterations to the Green Belt in Policy STRAT6. The policy proposes alter the Green Belt accommodate strategic allocations at STRAT8, STRAT9, STRAT10, STRAT11, STRAT12, STRAT13 and STRAT14. Boundaries of the reviewed Green Belt are identified on the proposed changes to the Green Belt boundary maps.

Not justified by the evidence base

First, our objection is linked to concerns about the Spatial Strategy expressed in response to Policy STRAT1. Despite a clear preference to evolve the Spatial Strategy by focussing development in the Science Vale and sustainable settlements (the Market Towns and the Larger Villages), the Strategy has moved from this approach 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. In the context of the proposed Green Belt alterations, this includes alteration for the allocations of strategic sites at Culham and Berinsfield, which forms parts of a more unsustainable approach that is preferred by the Council.

Second, our objection is also linked to the proposed alterations to the Green Belt to accommodate development at sites at the edge of Oxford. We have no concern with the introduction of additional sites on the edge of Oxford to meet the specific requirement for Oxford Sub-Area. In its observations on Policy STRAT1, Hallam Land has supported the accommodation of Oxford City's unmet needs on the immediate boundary of Oxford's built up area and where it is capable of providing the necessary related infrastructure. On this basis, the release of appropriate and carefully defined and planned strategic locations to meet such needs is welcome, in principle, as a sound strategy. Our concern in this context relates to the strategic allocation of land North of Bayswater Brook in Policy STRAT13, in that the proposed alteration to Green Belt and strategic allocation is limited and not fully reflective of the evidence base.

In our objection to Policy STRAT13 we consider that the strategic allocation should not be for 1,100 new homes alone and should include the additional land to the east of the existing draft allocation (Bayswater Brook) for circa 1,800-2,000 new homes, bring the total allocation to 2,900-3,100 dwellings. Amongst the wider benefits of altering the Green Belt to for a larger allocation of land at STRAT13, the alteration that would ensure the establishment of enduring Green Belt boundaries. As proposed, we are concerned that capacity of the site, designed to meet Oxford's unmet need up to 2031 will be insufficient in meeting further needs up to 2034 and beyond.

Not effective

Hallam's concern is that the proposed Green Belt alterations are not effective as drafted. With regard to STRAT1 it raises wider issues about the effectiveness of the delivery of the Spatial Strategy, in terms of the overreliance on strategic sites, particularly those such as Culham and Berinsfield. Evidence is lacking to provide certainty as to the number, timing or infrastructure limitations and the ability to fall back on other sources of supply where there is lack of provision. In this context the Science Vale (in terms of the focus on development at Didcot) Market Towns and Larger Villages and strategic sites at the edge of Oxford have a greater potential role in contributing to supply without unnecessary Green Belt release in less sustainable locations.

With regard to proposed Green Belt alterations at the edge of Oxford, the effectiveness of the proposed land release must be questioned which only seeks to balance Green Belt release with Oxford City's housing need up to 2031 and not beyond. In turn we are concerned that a key objective to ensure long term green belt boundaries and to prevent further harm to the Green Belt is not met.

In summary, 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 consistent with NPPF and Policy

With regard to the overall spatial strategy and proposals to alter the Green Belt, we do not consider that the proposed Spatial Strategy meets Green Belt policy set out in the NPPF. With reference to our concerns with the proposed Spatial Strategy in Policy STRAT1, the Council has failed to meet the requirements of the NPPF (paragraph 137) to demonstrate that it has fully examined all other reasonable options for meeting its identified need for development. In this context, this is the more sustainable option of focussing development at the Science Vale, Market Towns and Large Villages and also at the edge of Oxford. This calls into question the necessity of Green Belt alterations in less sustainable locations such as Culham and Berinsfield. To this end, by proposing green belt alterations to allocate sites in these less sustainable locations, the Council has failed to review Green Belt Boundaries in a manner that promotes sustainable development, contrary to paragraph 138 of the NPPF.

In proposing to alter Green Belt Boundaries, our view is that preferred option that aligns with our proposed approach stated in Policy STRAT1 is for Green Belt boundaries to be altered to allow for strategic allocations at the edge of Oxford.

The focus of development at the edge of Oxford has an important bearing on the extent of land release that should be planned at sites such as STRAT13. The planned release of Green Belt to accommodate strategic allocations must have a reasonable degree of permanence, with due regard to the NPPF in paragraph 136, in particular:

"Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period."

Furthermore, the NPPF states in paragraph 139, e) and f), that when defining green belt boundaries plans should:

“ be able to demonstrate that Green Belt boundaries would not need to be altered at the end of the plan period; and

“ define boundaries clearly, using physical features that are readily recognisable, and likely to be permanent”

We are concerned that the proposed release of green belt to accommodate the proposed strategic allocation such as those at STRAT13 (or across each of the Green Belt releases intended to meet Oxford's unmet needs) does not represent green belt boundary or boundaries that will have permanence. Our reasoning is that this site, among others proposed to meet the unmet housing needs of the city of Oxford is 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, and implications for an ongoing spatial strategy, green belt release and strategic site allocations 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

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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. Prioritising development at Culham in proximity to Abingdon promotes harm to Green Belt. Promoting development at Berinsfield promotes unsustainable development and additional car-borne commuting, given the distance of that part of the District from significant urban centres.

Proposals for growth at Culham and Berinsfield should therefore, 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.

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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