

JPPC ref: hv/6491

Planning Policy
South Oxfordshire District Council

SENT BY ELECTRONIC MEANS

12 February 2019

Dear Sirs

**RE: South Oxfordshire Local Plan 2011-2034- Final Publication
version 2nd (January 2019)**

Thank you for the opportunity to comment on your Local Plan 2011-2034- Final Publication Version 2nd. We write to make comments on behalf of our client Mr Amos of LASSCO who owns land in Milton Common.

Housing Distribution strategy

1. We are pleased the Council has acknowledged the potential of smaller settlements to contribute to the district housing supply, and the opportunity for development to maintain vitality in rural areas.
2. The proposed plan seeks to build upon the existing Core Strategy of a strong network of settlements. Even 'Other Villages' have an integral role in this network, with significant growth planned in the towns and larger villages it is imperative growth is allowed in smaller settlements to maintain a balanced and sustainable District.
3. Although the Core Strategy allows for infill opportunities this has led to a limited supply of new homes, yet the emerging Local Plan needs to find provision over and above Core Strategy levels. The Core Strategy was adopted in December 2012, therefore the opportunities created in the plan for infill development in 'Other Villages' have been effective for a reasonable time, although prior to 2012 the position was different and it has taken some time to transition to the more positive frame of mind.

4. Milton Common is an example of a linear settlement, categorised now in the CS and in the emerging plan as an Other Village, where development opportunities within the somewhat closed definition of infill in the Core Strategy are limited.

Comment on Policy H8

5. Draft Policy H8 of the consultation document identifies positive growth at smaller villages but this is somewhat opaque and insufficiently clear as to what might happen at places where a Neighbourhood Plan does not come forward.
6. At the Other Villages such as Milton Common it is less clear still what form of development may be allowed to come forward. Plans are meant to be positive towards housing growth- this is not obviously so.
7. Milton Common which sits at a major road junction where sustainable travel options can or should be relatively easy has in our view erroneously been graded as an 'Other Village' where less development is anticipated/planned, despite the clear ability of the settlement to make a meaningful contribution to housing provision. The village is unconstrained by heritage, conservation, biodiversity, flooding, green belt, SSSI or attractive countryside policy limitations, and remains somewhere where development should be directed to not away from. The position of Milton Common in and surrounded by white land is shown on the proposals map. The Council are dependent on the supply of homes in smaller villages to maintain their housing land supply, it is therefore imperative policy allows sufficient development opportunities to fulfil the identified need. Milton Common should be uplifted in the policy hierarchy to a smaller village. It can then help to provide more housing, placing it in the lowest category means that it cannot fulfil its potential.
8. It has a good range of services-especially employment- that put it in that position. For instance there is a large hotel, a highways depot, the Three Pigeons shop and café, a vehicle maintenance and sales depot- and two industrial complexes as shown attached. In our view insufficient regard has been given to the multiplicity of employment opportunities in the settlement. The village scores less in the matrix than does Moreton which is a tiny place constrained by a Conservation Area and Witheridge Hill and Russell's Water that are similarly tiny places constrained by AONB designation with no classified roads and no notable employment.
9. The higher order nature of roads in and around the settlement of Milton Common should be considered. New development is proposed in this plan which necessitates new infrastructure. Development at Milton Common would not necessitate any as more than enough infrastructure already exists.
10. The opportunities of a settlement- and absence of harm from any development- are insufficiently rewarded by the matrix score used in the settlement assessment. Contrarily the constraints of places such as those we list in paragraph 8 are also not a factor when reasonably they should be. The settlement assessment explicitly says (at para 4.15) it 'does not consider physical or planning land use constraints that may limit the opportunities for settlements to grow when scoring and subsequently ranking each settlement',

this seems quite nonsensical when the whole objective is to plan and use planning objectives and policies to do so, and cannot lead a sound plan being the result.

Comment on Appendix 2 of the settlement assessment background paper

11. Appendix 2 of the settlement assessment gives no weighting factor at all to employment resources. There are considerable employment resources at Milton Common that have zero weight in the planning process in the SODC assessment but that cannot be right- it is masking a vital element/prong of what sustainable development is and needs- the economic element.
12. With limited sites for redevelopment or infill development it is necessary for support in principle for development of sites to the edge of smaller villages. We previously supported the element that the previous draft policy H8 that would have allowed for development of 'suitable sites', but this seems to have been dropped- we don't understand why given the need for additional infrastructure that results from the Council's preferred spread. The dropped approach could wisely have provided development opportunities for suitable sites to the edge of sustainable settlements; quite appropriately it would not however have allowed for developments which were contrary to amenity which would have been precluded by relevant amenity policies in the Plan.

Conclusion and recommendations for changes to make the plan sound- in relation to appendix 7 of SOLP 2034

13. Milton Common should be in the Smaller Village category.

Conclusion and recommendations for changes to make the plan sound- in relation to H8

14. We note the suggested proportional growth rates for smaller villages of 5%-10%; these should be noted as a minimum requirement to realise the objective of sustaining vibrant rural communities. No evidence has been produced which suggests a greater level of growth would result in harm, an arbitrary figure should not therefore prevent the delivery of new homes- especially in unconstrained places like Milton Common.
15. We welcome proposals to encourage growth in South Oxfordshire's smaller villages, but find the plan unsound because that category fails to include Milton Common. The supply of a reasonable number of homes in Milton Common is essential if the vitality and character of the community is to be maintained and enhanced. The settlement can play a significant role in providing sustainable development because of the absence of any harm by development there, and due to the sustainable co-location of employment and housing thus reducing the need to travel.
16. The provision of homes in smaller villages is proposed as an important element of the District housing land supply, with development levels higher than that under the current Core Strategy. In order to satisfy this housing requirement we consider it necessary the Plan more obviously positively supports development on suitable sites including to the edge of smaller villages.

17. Draft policy H8 should include support for all small suitable sites not just 'strict infill', and to provide certainty in delivery we believe it is essential that explicit support is provided for sites adjoining smaller villages. Such a policy is considered essential if the Plan is to delivering the Plan Vision for a 'prosperous place to live' and meeting the Objectives including meeting the identified housing need.

18. We look forward to acknowledgement of receipt of these comments.

Yours sincerely on behalf of LASSCO/Amos

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Henry Venners [Redacted]
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Attached overleaf

1. Plan showing employment opportunities in Milton Common

Milton Common industry and links

