

South Oxfordshire Local Plan Proposed Main Modifications Consultation Comment Form

Please return by midnight on Monday 2 November 2020 via email planning.policy@southoxon.gov.uk or post to Freepost SOUTH AND VALE CONSULTATIONS (no stamp is needed and no further address is needed)

This form has two parts:
Part A – contact details
Part B – your comments

Part A

Are you responding as an: (please tick)

Individual

 Business or organisation

 Agent

A name and contact details are required for your comments to be considered.

	1. Personal Details	2. Agent Details (if applicable)
Title	<input type="text"/>	<input type="text" value="Mr"/>
Full Name	<input type="text"/>	<input type="text" value="James Yeoman"/>
Organisation (if relevant)	<input type="text" value="Bloor Homes (Southern)"/>	<input type="text" value="Savills"/>
Job Title (if relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>
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Address Line 2	<input type="text"/>	<input type="text" value="11 West Way"/>
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MAP MOD 3

Please provide your comments below:

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For information, Bloor Homes, in Partnership with Dare Warwick (Properties) Ltd, have previously made representation to the Local Plan process, including the Examination. Ladygrove East is also subject to two current outline planning applications (references: 19/S0720/O and P20/S2361/O).

Map Mod 3 continues to identify the Ladygrove East allocation (H2a reference now made by MM24). However, the map incorrectly identifies the boundaries of the site. The reasons for this were set out in Bloor Homes previous representations and Examination Hearing Statement to Matter 10. The extent of difference in allocated area is illustrated by the two extracts overleaf. Map Mod 3 fails to update the extent of previous allocation on its eastern edge.

Bloor Homes accepts that land needs to be safeguarded for NPR3 and has liaised closely with Oxfordshire County Council as Highways Authority, via application discussions. These discussions have enabled an understanding of safeguarding requirements for to enable NPR3 to come forward alongside the development allocation at Ladygrove East.

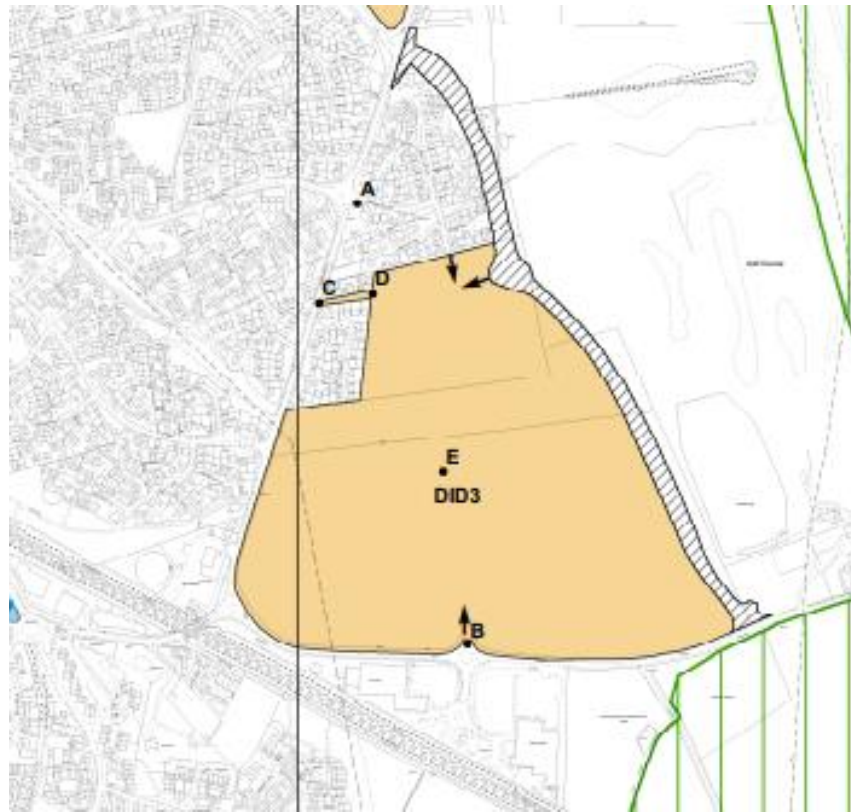
Map Mod 3 is noticeably different to the currently adopted Policies Map that underpins the Core Strategy and, as a result, significantly reduces the area of the Ladygrove East allocation below that currently identified by the Core Strategy. In turn, an area of land situated between Ladygrove East and NPR3 is isolated and excluded from serving a delivery role associated with either residential development or infrastructure provision. This results in an inefficient use of land.

This graphical anomaly should be updated to replicate the current illustration incorporated within the Core Strategy and Local Plan allocations of DID3 (see over). The identification of NPR3 can then be 'overlaid' as a safeguarding corridor. This approach will enable further dialogue between developer, landowners and both District and County Council interests and enable best use of the land as a result.

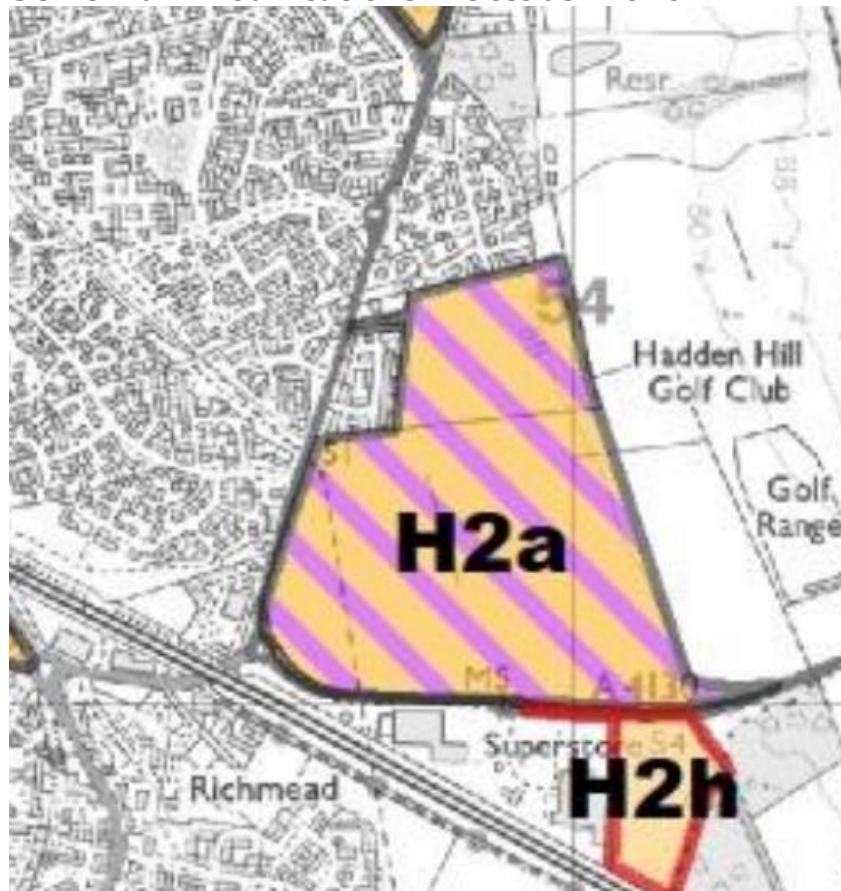
Bloor Homes therefore seeks that the proposals map accurately carries forward the Ladygrove East allocation area from the Core Strategy.

Please see overleaf:

SODC Core Strategy Policies Map – Dec 2012:



SODC Main Modifications – October 2020:



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MM6 - STRAT3

Please provide your comments below:

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For information, Bloor Homes, in Partnership with Dare Warwick (Properties) Ltd, have previously made representation to the Local Plan process, including the Examination. Ladygrove East is also subject to two current outline planning applications (references: 19/S0720/O and P20/S2361/O).

Bullet 3 of MM6 refers to the significant infrastructure improvements committed under Policy TRANS1b. The wording of bullet 3 of MM6 requires infrastructure *'to be in place'* to enable sites allocated in the Local Plan in and around Didcot to be delivered.

As currently worded, the above could be interpreted to suggest that no housing allocations can come forward prior to delivery of all infrastructure items in and around the town. Whilst the importance of secured funding and the significance of infrastructure delivery is recognised by Bloor Homes, the policy wording needs refinement.

By way of example, reference is made to H2a: Ladygrove East. The interrelationship of the site allocation and proposed Northern Perimeter Road 3 (NPR3) is evident. Application 19/S0720/O affords due consideration to necessary infrastructure delivery. Nevertheless, SODC's Infrastructure Delivery Plan2 identifies developer contributions are required towards delivery. Indeed this position is reflected in application dialogue held between SODC, Oxfordshire County Council (OCC) and the Applicants. Delivery of the Ladygrove East site (or proportion of) provides opportunity to secure advanced funding and assist towards the realisation of NPR3. It is for this reason that STRAT3 is currently too prescriptive and could be interpreted to conflict with NPPF Paragraph 34 (infrastructure undermining delivery of the plan). STRAT3 should be amended to the following effect to recognise the relationship between site and infrastructure delivery.

*'Significant infrastructure improvements are committed to under Policy TRANS1b Supporting Strategic Transport Investment. Infrastructure will need to be in place, **or appropriate funding secured towards future delivery of such items, in order** to enable sites allocated in the Local Plan in and around Didcot to be delivered.'*

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MM8 – Policy STRAT5

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Bloor Homes supports the deletion of previous elements of STRAT5 that provided an overly prescriptive approach to density requirements. The new approach set out by MM8 correctly allows for development to take account of site constraints, character and context to enable delivery of development at an appropriate density. Bloor Homes also supports the flexibility in approach (e.g. bullet 3 and paragraph 4.56) that allow for appropriate assessment against the indicative density requirement of 45dph at certain locations.

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MM24 – Policy H2

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Bloor Homes supports the individual site allocation references inserted. With regards to Ladygrove East, three comments are made:

1. A '*new paragraph 2*' is proposed specifically in relation to Ladygrove East (H2a). This carries forwards development principles associated with the historic allocation (e.g. open space provision). Nevertheless, the residential capacity of 642 new homes does not appear to have been subject to any assessment by the Council nor does it take account of design principles (e.g. density) that have evolved since the original allocation which dates back to Policy DID3 of the South Oxfordshire Local Plan 2011 (adopted in 2006).

Separate comment on STRAT5 is made by this submission. Nevertheless, paragraph 3 of MM8 (concerning STRAT5) sets out that sites '*well related to existing towns... and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot... should be capable of accommodating development at higher densities*'. Subject to design and character considerations MM8 sets out an expectation of net densities at a level of more than 45dph (net).

19/S0720/O provides an Illustrative Masterplan and Design and Access Statement which demonstrates the ability of the site to deliver a quantum of up to 750 dwellings. This capacity should be reflected by H2a and '*new paragraph 2*' to read 750 and not 642. The corresponding quantum for Didcot town under bullet 1 should reflect this 108 unit increase.

2. Bloor Homes notes the insertion of '*new paragraph 2*' under MM24. The allocation site includes a small parcel of land under the ownership of South Oxfordshire District Council. Bloor Homes is supportive of a comprehensive design approach to the parkland provision, though ultimately not all land is in its control. Accordingly, it is appropriate that flexibility in wording accounts for this land relationship in that individually Bloor Homes cannot delivery this parcel. Amended wording is proposed to the effect of:

*Proposals will be expected to deliver a network of public urban spaces and public greenspaces (~~not less than~~ **of approximately** 8 hectares) with the largest greenspace comprising a local park (~~not less than~~ **of approximately** 6 hectares) containing...*

3. The final sentence of '*new paragraph 2*' reports a '*buffer zones*' are required to '*protect homes from noise generated on major distributor roads and to protect road users from the Hadden Hill Golf Course*'. Whilst these principles are understood, the current wording fails to have any regard or reference to the route of NPR3 that is proposed to run between H2a and the golf course. It is appropriate that '*new paragraph 2*' has

regard to this relationship and the mitigation that should come forward in conjunction with NPR3. Additional wording is proposed to the effect of:

*The buffer zones will be of sufficient width to protect homes from noise generated on major distributor roads and to protect road users from the Hadden Hill golf course. **Appropriate mitigation will be considered with regards to the mitigation and delivery proposals proposed as part of NPR3 to the immediate east of the allocation site.***

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