

## 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](mailto: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="Owen Jones"/>
Organisation (if relevant)	<input type="text" value="Bloor Homes"/>	<input type="text" value="LRM Planning"/>
Job Title (if relevant)	<input type="text"/>	<input type="text" value="Director"/>
Address Line 1	<input type="text"/>	<input type="text" value="22 Cathedral Road"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text" value="Cardiff"/>
Postcode	<input type="text"/>	<input type="text" value="CF11 9LJ"/>
Telephone Number	<input type="text"/>	<input style="background-color: black; color: black;" type="text"/>
Email Address	<input type="text"/>	<input style="background-color: black; color: black;" type="text"/>

### Sharing your personal details

Your name, contact details and comments will be shared with the Planning Inspector and a Programme Officer, who acts as a point of contact between the Council, Inspector and respondents.

This means that you may be contacted by the Programme Officer or the Council with updates and in relation to any necessary consultations on the Local Plan. This is in accordance with Regulation 19 and 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 13 of The Environmental Assessment of Plans and Programmes Regulations 2004 and Regulation 102 of The Conservation of Habitats and Species Regulations 2017.

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.

Comments submitted by individuals will be published on our website, alongside their name. No other contact details will be published. Comments submitted by businesses and/or organisations will be published, including contact details.

Please refer to our Privacy Notice regarding how your personal data is used for this consultation, available on our website [southoxon.gov.uk/newlocalplan](https://southoxon.gov.uk/newlocalplan). If you would like to know more about the councils data protection registration or to find out about your personal data, please visit: [southoxon.gov.uk/dataprotection](https://southoxon.gov.uk/dataprotection)

### Future contact preferences

As explained above, 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 consultation 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

## Part B – Please use a separate sheet for commenting on each proposed main modification or consultation document

You can provide your comments on the Emerging South Oxfordshire Local Plan Proposed Main Modifications in this section.

The list of documents you can comment on are:

- Schedule of Proposed Main Modifications
- Schedule of Policies Map Changes
- Sustainability Appraisal Report Addendum
- Habitats Regulations Assessment Addendum

**Please note we are inviting comments on the Proposed Main Modifications and documents listed above only - this is not an opportunity to make comments on any other part of the Plan.**

If you are commenting on the Main Modification document, please provide the main modification number (for example MM1) in the box below.

If you are unsure of the 'modification number', please refer to the Schedule of Proposed Main Modifications.

If you are commenting on any of the other consultation documents (for example the Sustainability Appraisal Addendum), please provide the relevant section, paragraph or page number in the box below:

Modification Number or  
Document, section, paragraph or page  
number

MM25 Policy H3 Henley-on-Thames

Please provide your comments below:

If your comments are over 500 words it would be really helpful if you could also provide a summary of your comments using the text box in the next question.

If you wish to include any supporting documents, please attach them to this comment form.

Please see attached.

If your comments cover more than the boxes provided, please use the space below to provide a summary. You are not required to summarise your comments, but a summary would help us in our reporting.

Please provide your summary below:

- 1.1. The modification proposed to the expression of housing provision at the market towns emanates from the Local Plan Inspector's clear view that these are sustainable settlements that have an important role to play in role in delivering housing to meet the overall requirement and local needs. By proposing the term "minima" this signals that efforts should be made to plan for and accommodate a greater level of housing development in these locations.
- 1.2. We welcome and support the modifications that introduce the terms "at least" or "minimum" in Policy H3 and its supporting text. However, the articulation of minima must positively emphasise the expectation that Neighbourhood Developments Plan exceed this minimum level of housing. We have identified two examples – paragraph 5.16 and Table 5d - where further minor modifications can improve consistency with Policy H3 and commend these to the Council.
- 1.3. However, supplementary text to explain the importance of exploring opportunities to address local needs should extend to consideration of **housing type** (i.e. family housing) should be included in the Local Plan. This would ensure the policy framework provided by the Local Plan for Neighbourhood Plan preparation is "effective".

**Thank you for your comments.**

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# **SOUTH OXFORDSHIRE LOCAL PLAN**

## **PROPOSED MODIFICATIONS SEPTEMBER 2020**

### **Representations on behalf of Bloor Homes Limited**

#### **1. Introduction**

- 1.1. Bloor Homes has submitted representations to various stages of the emerging Local Plan process in respect of Henley-on-Thames, namely Policy HEN1 and Policy H3 which set out the housing requirement for this Market Town.
- 1.2. Bloor Homes participated in the Matter 17 debate at the Examination, where its representations argued that Henley-on-Thames was a suitable location to accommodate additional housing development to that indicated in the Submission version of the Local Plan.
- 1.3. In the Inspector's Preliminary Conclusions and Post-Hearings Advice, he comments as follows in respect of Matter 17:
  - The market towns are some of the best connected and most sustainable settlements in the district and have a role in delivering housing to meet the overall requirement and local needs;
  - there is no convincing evidence that it is necessary to restrict housing development to 15% or less in order to avoid harm to any of the towns, the surrounding landscape, the AONB or other designations;
  - To ensure that the plan takes a positive approach towards sustainable development opportunities in the market towns, the housing requirements for the market towns, and the outstanding requirement for neighbourhood development plans, should be expressed as minima.
  - The policy should also indicate that NDPs should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the minimum outstanding requirement.
- 1.4. The definition of minimum means "*the least possible amount*" and therefore modifications to the Local Plan Policies and supporting text must ensure that Neighbourhood Development Plans for the Market Towns are prepared on the basis that they look to exceed and not simply meet this requirement in order to be contribute to sustainable development as a *basic conditions* test.
- 1.5. In the following paragraphs we comment on the various proposed modifications that relate to housing provision at Henley-on-Thames.

## **2. MM19 Policy HEN1. The Strategy for Henley-on-Thames**

- 2.1. This Policy is framed by, and must be consistent with, Policy STRAT1, which outlines a Strategy to support the roles of the District's Market Towns by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and mixed-use developments and by providing new homes, jobs, services and infrastructure;
- 2.2. In these terms, Policy HEN1 refers to the town's retail and leisure offer being strengthened, community infrastructure being supported, improvements in accessibility and sustainable travel being sought and new employment opportunities to be provided both at existing and new sites. It also affords protection to the town's natural and historic environments.
- 2.3. By introducing the reference to Policy H3, MM19 establishes the level of new housing that should be provided by 2034 at Henley-on-Thames. We support this proposed modification.

## **3. MM25 Policy H3. Housing in Henley-on-Thames**

- 3.1. This proposed modification relates to Policy H3 which concerns housing in the market towns and cross references with Policy HEN1.
- 3.2. We support this proposed modification which introduces the term "minimum" in criterion 1:

*"A minimum housing requirement of 3,873 homes will be collectively delivered in the towns of Henley-on-Thames, Thame and Wallingford as follows"*

- 3.3. We also support the introduction of the term "at least" in criterion i)

*"Henley-on-Thames: at least 1,285 homes"*

- 3.4. These modifications accord with para 34 of the Inspector's Preliminary Conclusions and Post-Hearings Advice.
- 3.5. MM25 also proposes modifications to supporting text, namely paragraphs 5.14, 5.17 and Table 5d.
- 3.6. The proposed modification to paragraphs 5.14 is as follows:  
*"The NDP, or review of the made NDP, for each town must explore opportunities to address local needs and provide allocations to meet or exceed the minimum requirements in Policy H3".*
- 3.7. We welcome the additional text which again reflects the Inspector's Preliminary Conclusions and Post-Hearings Advice, however retaining the words "to meet" could encourage NDPs simply to plan for the minimum level of housing which would be at odds with the emphasis in the

Inspector's conclusions that each of the market town is suitable and capable of providing additional housing.

- 3.8. Moreover, at Henley-on-Thames, there has been a predominance of apartment development and elderly persons accommodation which has derived from the emphasis in the Neighbourhood Plan on sites within the town centre. Added to this have been a number of Office to Residential conversions which are characterised by further flatted development.
- 3.9. In contrast, the Strategic Housing Market Assessment identifies the greatest need for family housing. This informs the Neighbourhood Plan objective to ensure that *"To deliver an appropriate range and mix of housing to achieve a balanced community and in particular help meet the needs of those age and income groups who have difficulty finding homes in Henley"*. (HO4, page 17)
- 3.10. Supplementary text to explain the importance of exploring opportunities to address local needs should extend to consideration of housing type (i.e. family housing) required at Henley-on-Thames should be included in the Local Plan. This would ensure the development allocations are appropriate in terms of type of accommodation rather than simply a numerical exercise.
- 3.11. The proposed modification to paragraph 5.16 is as follows:

*Ultimately ~~the~~ a detailed evidence base will need to be provided to support each neighbourhood Development Plan and its assessment of land availability, infrastructure delivery and landscape capacity, whether this is to support a higher or lower number than that to meet the figures provided in table 5d: Provision of homes at the market towns.*

- 3.12. To be consistent with Policy H3, this paragraph should be further modified to explain that this is a "minimum" requirement, and not a figure simply to be met. i.e. a floor to be exceeded not a cap or a ceiling on development.
- 3.13. The proposed modification to paragraph 5.17 again introduces the term "minimum" which we support.
- 3.14. However, Table 5d is expressed slightly differently and the overall numbers for each of the market towns is simply a figure e.g. 1285 for Henley-on-Thames, without the prefix "at least" from Policy H3. For consistency with Policy H3, this Table should be re-worded to state "at least 1285 homes" for Henley-on-Thames and similar for Thame and Wallingford.

#### **4. Summary**

- 4.1. The modification proposed to the expression of housing provision at the market towns emanates from the Local Plan Inspector's clear view that these are sustainable settlements that have an important role to play in delivering housing to meet the overall requirement and local needs. By proposing the term "minima" this signals that efforts should be made to plan for and accommodate a greater level of housing development in these locations.

- 4.2. We welcome and support the modifications that introduce the terms “at least” or “minimum” in Policy H3 and its supporting text. However, the articulation of minima must positively emphasise the expectation that Neighbourhood Developments Plan exceed this minimum level of housing. We have identified two examples – paragraph 5.16 and Table 5d - where further minor modifications can improve consistency with Policy H3 and commend these to the Council.
  
- 4.3. However, supplementary text to explain the importance of exploring opportunities to address local needs should extend to consideration of **housing type** (i.e. family housing) should be included in the Local Plan. This would ensure the policy framework provided by the Local Plan for Neighbourhood Plan preparation is “effective”.

***LRM Planning***

***2<sup>nd</sup> November 2020***