

South Oxfordshire Local Plan  
**Proposed Main Modifications Consultation**

**Gladman Developments**



**October 2020**

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# 1 INTRODUCTION

## 1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the South Oxfordshire Local Plan Proposed Main Modifications.

1.1.2 Gladman Developments specialise in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in the development industry. From that experience, we understand the need for the planning system to provide the homes and jobs that are required to meet Central Government’s objectives and the needs of local communities.

1.1.3 Our comments on the Proposed Modifications are contained in Section 2 of this submission. Should further hearing sessions be needed as a result of these changes, then Gladman would request to be kept informed of any such sessions.

## 1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

## 2 SOUTH OXFORDSHIRE LOCAL PLAN MAIN MODIFICATIONS

### 2.1 Comments

#### **Main Modification MM1**

- 2.1.1 Gladman support Main Modification 1 which provides updates throughout the Plan to reflect the proposed the new end date of the Plan (2035) and ensure a 15 year period from adoption as required by the NPPF.<sup>1</sup>

#### **Main Modification MM4**

- 2.1.2 Main Modification 4 relates to Policy STRAT1: The Overall Strategy and proposes additional text which highlights support for growth in locations which help to reduce the need to travel, such as the focus at Science Vale, Towns and larger villages as well as allocations adjacent to the City of Oxford.
- 2.1.3 Gladman support the direction of growth to areas which reduce the need to travel and that are located sustainably. However, we reiterate concerns regarding the proposed Spatial Strategy which were highlighted within Gladman’s Matter 4 Hearing Statement, particularly in relation to Strategic Site Allocations.
- 2.1.4 It is not possible to ascertain whether the proposed spatial approach is a justified ‘appropriate strategy’ as insufficient testing of the available and alternative options has not been undertaken.
- 2.1.5 As discussed, the Main Modifications highlight the need to support growth in sustainable locations which help to reduce the need to travel. Indeed, Reading provides an inherent sustainable and suitable location to accommodate growth with its functional housing market links with South Oxfordshire and its location beyond the Green Belt. Additionally, the urban edge of Reading provides opportunities to access employment in Reading using a range of sustainable transport modes as well as accessibility to readily available infrastructure. This is without considering a new park and ride scheme proposed at Playhatch which would provide further offerings to the sustainable transport modes on the edge of Reading.
- 2.1.6 Yet, Reading has not been given sufficient consideration within the plan making process despite being found as equally sustainable as Oxford within early iterations of the Sustainability Appraisal (SA).
- 2.1.7 Furthermore, when considering the reasons for why development on the edge of Reading was discounted and the significant swathe of release from the Oxfordshire Green Belt, Gladman contend that the strategy proposed is not appropriate or justified and is therefore unsound. Gladman consider

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<sup>1</sup> NPPF (2019) Paragraph 22

that to resolve this issue the appropriate course of action would be a reconsideration of sites on the edge of Reading in full and a reconsideration of the spatial strategy.

- 2.1.8 Additional commentary relating to the release of land from the Green Belt is provided in response to Policy STRAT6: Green Belt and Main Modification 9.

#### **Main Modification MM5**

- 2.1.9 Gladman support MM5 which sets to align the housing requirement with the extended plan period up to the year 2035, alongside amendments to the wording of the 4,950 new homes to address Oxford's unmet housing need. However, Gladman suggest that concerns remain in relation to the proposed stepped trajectory.
- 2.1.10 Firstly, Gladman highlight that the monitoring and review table relating to STRAT2 on page 228 should also be amended to refer to the unmet need of Oxford, rather than '*...to meet Oxford City's contribution to the Growth Deal*' in order to align with the previous amendments within MM5.
- 2.1.11 Secondly, Gladman contend that the proposed stepped trajectory will lead to further delay to meeting the identified housing needs of the District with a basis on over optimistic delivery timescales and without consideration of alternative sustainable sites which could support the trajectory. In this regard, Gladman propose that employing such a stepped trajectory would be unsound.
- 2.1.12 In addition, the Council's historic completion data has manufactured a cumulative housing shortfall of 1,506 dwellings up to 2018/19 and will continue to demonstrate a housing shortfall until 2021/22 assuming the modified stepped housing trajectory is achieved (Gladman assert that this will not be the case due to over optimistic delivery rates). These assumptions due not account for the delivery issues associated with COVID-19. These further highlights that employing a stepped trajectory would lead to further delay to meeting the identified housing needs of the district.
- 2.1.13 Furthermore, Gladman contend that if the spatial strategy and site selection process had been conducted thoroughly it would have identified alternative development sites, smaller in nature, which would support residential delivery in the plan period and remove the reliance on a stepped trajectory

#### **Main Modification MM8**

- 2.1.14 Gladman support the modifications proposed to STRAT5: Residential Densities which provides additional flexibility for site specific circumstances including the character of the area.
- 2.1.15 A blanket minimum density requirement is applied for '*sites well related to existing towns and villages and served by public transport or with good accessibility by foot or bicycle to the town centres of Didcot, Henley, Thame and Wallingford or a district centre within Oxford City*' whereby they are expected to accommodate development of more than 45 dwellings per hectare (DPH). However, Gladman further support the flexibility within the policy wording which allows for the application of lower densities whereby this is justified through design or planning reasons.

**Main Modification MM9**

- 2.1.16 Main Modification 9 provides amendments to Policy STRAT6: Green Belt and the alterations of Green Belt boundaries to accommodate strategic allocations within the Plan. Gladman have serious concerns that the Council cannot demonstrate strategic level exceptional circumstances to justify the extent of Green Belt release proposed.
- 2.1.17 The NPPF 'raises the bar' in relation to Green Belt release requiring the strategic policy-making authorities to demonstrate that it has examined *fully* all other reasonable options for meeting identified need for development before concluding that exceptional circumstances exist [own emphasis added]<sup>2</sup>.
- 2.1.18 The Council consider that two exceptional circumstances exist to justify the release of land from the Green Belt. Firstly, the Council state that there is, "...[an] unprecedented need for housing and the housing requirement that the Council has established within South Oxfordshire" which cannot be met on non-Green Belt land<sup>3</sup>.
- 2.1.19 The second key exceptional circumstance claimed by the Council is the existence of sustainability and deliverability issues at *all* non-Green Belt potential strategic allocation alternatives. The Council further state, "*There are significantly more sustainable options for strategic allocations that are available and deliverable on sites, currently within the Green Belt*"<sup>4</sup>.
- 2.1.20 Gladman accept that the unmet need arising from Oxford may be deemed an exceptional circumstance justifying the release of limited Green Belt land. It would also be a reasonable proposal to direct Oxford's need towards the Green Belt in close proximity to the functional market area where the housing need arises. However, the release of land from the Oxfordshire Green Belt is unproportionate when compared to the figure required to meet Oxford's unmet need. This is discussed in further detail within our Matter 6 Hearing Statement.
- 2.1.21 South Oxfordshire District Council should have fully explored and examined all sustainable site options and spatial strategies prior to resolving that exceptional circumstances exist to justify the quantum of Green Belt proposed, in accordance with Green Belt policies contained within the NPPF. As discussed in relation to MM4, Gladman assert that sustainable development locations including the edge of Reading, highlighted within early iterations of the SA, have not been fully considered. Therefore, it is clear that the exceptional circumstances required to justify the release of Green Belt land have not been fully demonstrated.

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<sup>2</sup> NPPF (2019) Paragraph 137

<sup>3</sup> South Oxfordshire Local Plan 2034 - Strategic Site Selection Background Paper Part 2

<sup>4</sup> South Oxfordshire Local Plan 2034 - Strategic Site Selection Background Paper Part 2

## 3 CONCLUSION

### 3.1 Overall Conclusions

3.1.1 Gladman welcome the opportunity to comment on the South Oxfordshire Local Plan Main Modifications. For the Plan to be found sound it must be able to meet the four tests of soundness set out in the Framework and highlighted in Section 1 of this submission.

3.1.2 Having reviewed the proposed modifications, Gladman believe that further modifications and work must be carried out to ensure the Plan is sound. Gladman have concerns regarding the spatial strategy and site selection process which have been highlighted through these representations. It is our view that the evidence does not exist to demonstrate exceptional circumstances for Green Belt release as other alternative site options have not been fully explored as required by the Framework. Furthermore, the Council's own evidence base suggests that locations on the edge of the Reading urban area are equally as sustainable as Oxford. Yet, these locations and sites have not been fully considered through the site selection and plan-making process.