

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

Mr

Mr

Full Name

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Nick Freer

Organisation (if relevant)

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David Lock Associates

Job Title
(if relevant)

Regional Director

Chairman

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Address Line 2

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Address Line 3

Postal Town

Postcode

MK9 3BP

Telephone Number

Email Address

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. 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

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- 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 – Modifications to H3 & explanatory text

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.

Summary

The Schedule of Proposed Modifications to Policy H3 (Housing in the towns of Henley-on-Thames, Thame and Wallingford) are considered inadequate in providing future housing in the sustainable market town of Thame. Hallam has raised a number of objections to this policy at Regulation 19 stage, alongside hearing statements submitted for the Local Plan Examination. Representation was also made on behalf of Hallam during the Local Plan Examination hearings by David Lock Associates. It appears the written and verbal representations previously submitted have not been adequately acknowledged in relation to this policy.

Although Hallam is in support of the change made through Main Modification 25 with the inclusion of the word 'minimum' in respect to housing in Thame, it is clear that the sustainability of the market towns such as Thame, emphasised within the Local Plan and within Policy STRAT 1 has not in parallel lead to significant increase in the housing provision at Thame. Instead, unsustainable and potentially undeliverable strategic sites are being pursued despite the undeniable certainty that increasing housing provision at Thame would lead to achieving suitable, sustainable and deliverable housing to meet local needs.

H3- Hallam are extremely surprised that the numbers are still so low, implications are:

Hallam acknowledges and supports the intention of the proposed modification to H3 to require a minimum housing requirement, to be delivered in the market towns such as Thame. The 'minimum' outstanding requirement for the is intended, Hallam believes, to encourage the Neighbourhood Planning Forum and/or District Council to look to deliver more than the minimum requirement set out in H3. It is accepted that the modification has the advantage of averting the previous risk that a NDP could be prepared which provided for a lower level of new homes than set out in the South Oxfordshire Plan.

However Hallam does not believe that the simple imposition of a minimum provides any real teeth to support the objective of bringing forward a much wider range of sustainable opportunities in what are accepted to be some of the most sustainable locations of all in the District – the market towns. Rather there is every risk that both NDP policy making and District level decision making will be satisfied once the not very challenging minimum target has been met and that the consequence will be that highly sustainable development opportunities will thereafter be overlooked notwithstanding their merits and the need to deliver new homes – market and affordable, alongside the wider benefits brought about by development – infrastructure, community benefits and the like

Hallam believes that the remedy to the problem identified by the Inspector is not simply a minimum requirement but a positive planning response that is totally in accord with the NPPF i.e. the additional adoption of a higher housing target in the market towns and, in particular, in Thame.

Hallam, does not support the amount proposed for Thame, for many reasons.

First, it does not reflect the evidence base that demonstrates first that Thame is a highly sustainable location for development and second, that there are a number of other specific sites that have been deemed to be available and suitable for development – and of course deliverable.

Table 5d sets out the Provision of homes at market towns, including Thame, as amended to take account of revised completions as of 1st April 2020. The requirement for the market towns (at Core Strategy plus 15% growth) remains unchanged. With completions and commitments reaching 1,179 dwellings on 1 April 2020 this also equates to in an increase in the outstanding minimum requirement of just 339 dwellings.

Second, Hallam considers this remaining minimum requirement for Thame, which equates to 22.6 dwellings per annum is extremely low relative to the level of need and the opportunities for sustainable growth. The level of need and suitability of development at Thame is further reinforced by the strong progress in implementing the committed and Neighbourhood development sites already allocated in Thame. The previous wording of Policy H3 stated that a remaining 363 homes would be allocated through a Neighbourhood Development Plan. This figure equates to an additional 24.2 dwellings per annum during the plan period. Although this is still a surprisingly low figure, this figure was higher than the 22.6 dwellings per annum during the plan period that are now being planned for.

Third, the remaining requirement, as a minimum, offers limited scope for the review of the Thame NDP to identify additional housing sites. The Thame NDP is in the early stages of review, commencing with a call for sites in March 2019. The plan has no obligation to find sites for housing other than to meet the minimum remaining requirement of 339 dwellings. In Hallam's view, restricting provision to a minimum requirement would equate to putting an unnecessary and unsustainable brake on housing supply at Thame. The brake on development and effective halt in the housing trajectory for the town is further evidenced by the strong progress

already being made in implementing the commitments in Thame. They will soon come to an end. Neighbourhood Planning in Thame has successfully delivered yet is now – effectively being asked to stand down given the small number of new homes being required in the Plan. This is also likely to lead to a number of very small sites around Thame providing market housing and consequently leading to a reduction in the number of affordable homes across Thame.

The application of an apparent brake to development is not the intention but the effect. It appears to be the legacy of the previous Heart of the District Strategy which has long been abandoned and is unsustainable.

In limiting the scope for additional planned sites coming forward, a restricted supply is likely to have an adverse impact on securing adequate affordable housing in Thame.

Fourth, with the housing requirement for the district being increased with the extended plan period by 775 dwellings, Hallam considers that much of this increase should also be applied to one of the most sustainable options/locations in the District – the market towns and Thame in particular.

Instead the Council's proposed modifications rely almost in totality in delivering the additional numbers by adding the possible completions from one more year of the trajectory on each of the strategic sites.

Already the risks of failure to deliver the strategy are high because of the heavy reliance on strategic sites. The proposed modifications further exacerbate that risks and undermine the ability to bring forward non-strategic opportunities in strategically important locations – e.g. market towns.

The Thame NDP has already demonstrated the ability to deliver sustainable growth of the market towns yet is being passed over in favour of highly questionable assumptions and prospects of delivery on strategic sites. These sites include the strategic allocation at Chalgrove which is not only reliant on significant amounts of infrastructure for sustainability but also faces considerable uncertainty over deliverability.

Chalgrove Airfield site is owned by Homes England and is currently leased to Killinchy Aerospace Holdings Limited (Killinchy). Its subsidiary – Martin-Baker Aircraft Company Limited (Martin Baker) occupies the Airfield, undertaking the development and testing of aircraft ejection equipment, operates a pyrotechnic facility and uses the airfield for the take-off and landing of aircraft. Killinchy's lease is not due to terminate until March 2063 and is a protected lease under the Landlord and Tenant Act 1954 allowing Killinchy to apply for a new lease in March 2063.

Killinchy have clearly stated that it will not surrender its lease to enable the airfield to be reconfigured to accommodate housing development. They have also stated that they will resist Compulsory Purchase efforts by Homes England. Killinchy have stressed that Martin- Baker operates a globally important business and the protection of that business is in the national public interest. This could lead to a considerable amount of uncertainty on whether a CPO can be confirmed. The aspiration to Champion Neighbourhood Planning is manifestly not true in Thame.

If Thame is to sustain a reasonable and consistent level of growth, affordable housing delivery and effective planning and delivery in the towns social and economic infrastructure over the plan period, a more generous requirement is required. This is necessary to inform a review of the Thame Neighbourhood Plan. A larger requirement would also be better aligned with the Borough's spatial strategy (Policy STRAT1) in terms of the role of the district's market towns in accommodating growth.

Hallam's proposition to the issue of ensuring the delivery of sustainable development opportunity is to increase the requirement in Thame in H3 from 1,518 to 1,800 new homes.

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Please provide your summary below:

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Agent

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1. Personal Details

2. Agent Details (if applicable)

Title	<input type="text" value="Mr"/>	<input type="text" value="Mr"/>
Full Name	<input type="text" value="Andrew Birch"/>	<input type="text" value="Nick Freer"/>
Organisation (if relevant)	<input type="text" value="Hallam Land Management"/>	<input type="text" value="David Lock Associates"/>
Job Title (if relevant)	<input type="text" value="Regional Director"/>	<input type="text" value="Chairman"/>
Address Line 1		<input type="text" value="50 North Thirteenth Street"/>
Address Line 2		<input type="text" value="Central Milton Keynes"/>
Address Line 3		<input type="text"/>
Postal Town		<input type="text"/>
Postcode		<input type="text" value="MK9 3BP"/>
Telephone Number		
Email Address		

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Modification Number or Document, section, paragraph or page number

MM17 – Modifications to STRAT13 & explanatory text

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.

Summary

The Schedule of Proposed Modifications anticipates modest changes in respect of Land at Bayswater Brook in Policy STRAT13. Hallam has raised a number of objections to the policy at Regulation 19 stage and is disappointed that the wider capacity of the location and the need for the definition of long term boundaries has not resulted in the proposed modifications that Hallam had sought.

On the specific matters of the Proposed Modifications, Hallam is broadly in acceptance of the policy as proposed revised and supports the additional emphasis in the policy in providing for non-car modes of travel. With a longer term and strategic view however, we would continue to question the permanence of the amended Green Belt allocation and the extent of the proposed allocation, particularly in the context of:

- 1) How the future housing needs of the City of Oxford will continue to be met beyond 2031 in the most sustainable way with an increasingly constrained capacity within the City; and
- 2) The adequacy of infrastructure to support the development of the Strategic Allocation and potential future expansion – and the imperative in our view of the potential link road.

How the future housing needs of the City of Oxford will continue to be met beyond 2031 in the most sustainable way with an increasingly constrained capacity within the City

During the Local Plan process, we have raised concerns about how the housing needs of Oxford City would continue to be met beyond 2031 both within the remainder of the Local Plan period and beyond. In this context we have questioned the permanence of the proposed alterations to the Oxford Green Belt, particularly to facilitate the Strategic Allocations around the edge of Oxford throughout the Local Plan process.

The Local Plan proposes to meet unmet needs for 4,950 in the district, as part of a wider Memorandum of Understanding between the District Authorities to provide for 14,300 dwellings, up to 2031. Beyond 2031 and indeed 2036, there will continue to be a requirement to meet Oxford's housing growth requirements, which are only likely to become more acute with increasingly limited opportunities to meet the needs within its own boundaries, and with a continued agenda for housing growth beyond the Housing Growth Deal arising through the Oxford Cambridge Arc.

As stated in Section 3.12 of the City of Oxford Local Plan (Adopted in June 2020), the Oxfordshire authorities have committed to producing a new Joint Statutory Spatial Plan (JSSP) for Oxfordshire for the period to 2050. In providing the strategic planning framework for Oxfordshire, the JSSP will deal with any objectively assessed housing need from Oxford in the period 2031-50 which cannot be met within Oxford's administrative boundary, and the apportionment of homes provided in other districts. In this context, we anticipate that in order to continue meeting Oxford's unmet needs in the most sustainable way a further review of the Oxford Green Belt is likely to be necessary to inform potential locations for accommodating Oxford's unmet needs beyond 2031 at Oxford's built edge.

We have responded to the earlier "Big Discussion" undertaken in April 2019 and call for Strategic Location Ideas. In our response, we have set out a compelling case for continuing the strategy to meet Oxford's unmet housing needs with an expanded allocation at Land at Bayswater Brook, itself a sustainable location (reinforced by the Inspectors proposed modifications) which we have referred to as Land North of Headington. In setting out our case for an expanded allocation we set out the key benefits:

- At the northern edge of Oxford, the site is well-related to the city and is well-placed for continuing to meet the needs of Oxford beyond the 2031 period that the authorities in Oxfordshire have planned for so far.
- The site is in a sustainable location for development, close to major employment locations, and a wide range of services and facilities that can be accessed by walking and cycling.
- The development can be designed to link with sustainable transport infrastructure, connecting the site with key destinations to encourage modal shift and reduce the need to travel by car.
- The development can continue to support the regeneration of existing communities such as Barton with strong connections and facilitate improvements to existing neighbourhood facilities.

The compelling benefits of the location are accepted in the Site Selection Background Paper and the Sustainability Appraisal of the publication draft of the Local Plan 2019.

Additional land had been considered through the SHELAA process and within the wider evidence base that supports the Local Plan including the Local Green Belt Study for South Oxfordshire District. As identified by the evidence base, the additional land is similar in landscape character to that already forming part of STRAT 13.

Much of the site was also considered in a study of potential Green Belt release options in the Oxford Spatial Options Report 2016. The study report is favourable in assessing that there may be potential for development on the lower slopes without significant harm to the Green Belt's function. The study also recognises the good proximity of the site to local services and community infrastructure and employment opportunities.

In the context of the Joint Statutory Spatial Plan for Oxfordshire, the proposed expansion would also contribute to a spatial strategy that would prioritise growth first towards the most sustainable location — Oxford. As assessed by the Inspector examining the Local Plan, locating development at the edges of the city [to meet Oxford's unmet housing needs] would avoid less sustainable development patterns that encourage longer journeys, including those by car. Therefore, continued growth at the edges of Oxford on sites close to employment, a wide offer of facilities, which can play a role in sustaining future investment in public transport infrastructure, will continue to be the most appropriate response in continuing to meet the unmet needs of the city beyond 2031.

Hallam recognises that the Inspector has not addressed these issues in the expectation that the forthcoming strategic plans will be the vehicle to do so.

Going forward we also expect that the context and indeed strategy for continuing to meet Oxford's unmet needs for the period 2031 – 2050 will become firmly established in the Joint Statutory Spatial Plan for Oxfordshire to 2050. In this context it is considered that further, more comprehensive alterations to the Green Belt will be necessary to allow longer term growth needs to be met. In anticipation of such a review of the Green Belt alongside the consideration of potential sites for accommodating Oxford's future housing needs, we respectfully request the District Council in due course to consider the potential for an expanded site at Land North of Bayswater Brook (referred to as Land North of Headington).

A simple reference to the need to consider the potential for expansion of the allocation and or green belt release through the JSSP or other vehicle would provide some additional clarity and certainty.

The adequacy of infrastructure to support the development of the Strategic Allocation and potential future expansion

Through the local plan process we have raised concerns with the deliverability of transport infrastructure proposed in Policy STRAT13 and have argued for an expanded allocation to secure the delivery of the proposed link road between the A40/ B4150/ Marsh Lane junction and the A40 between the Thornhill Park and Ride junction and the Church Hill junction for Forest Hill. The proposed policy for the allocation, as modified also leads us to raise concerns over the reduced education capacity in STRAT13 2(iii) from 2 form entry to 1.5 entry.

Transport Infrastructure

Overall, we support the additional emphasis in the policy in providing for non-car modes of travel combined with measures to deal with any significant residual impacts on the highway networks that takes into account the benefits from the sustainable transport measures describes in Policy STRAT13.

We have residual concerns however, about the deliverability of the potential types of improvements that have been deleted from the Policy but, rightly, continue to appear in the preamble to the Policy in Paragraph 4.115. These included either a significant upgrade of the A40 Northern Oxford Bypass including of the A40/A4141 roundabout, including grade separation or a new link road between the A40/ B4150/ Marsh Lane junction and the A40 between the Thornhill Park and Ride junction and the Church Hill junction for Forest Hill.

As evidenced in our response to Matter 16 we have questioned the feasibility of further alterations of the Headington Roundabout which has already been improved. Further upgrades to the A40, such as grade separation, is not considered to be desirable and would simply reinforce the severance impacts of the A40 corridor. We would also question whether this this improvement could be supported by the development or would require additional financial support.

We continue to favour the option of a new link road, which, if combined with improved pedestrian and cycle crossings on the A40, would be better aligned with the Oxford Transport Strategy particularly in terms of providing connections to existing and proposed public transport infrastructure.

Based on the current proposed allocation, the deliverability and effectiveness of the link road could be questioned. The policy lacks certainty in terms of the route suggested between the Thornhill Park and Ride junction and the Church Hill junction for Forest Hill. In addition, an indicative line is absent beyond the allocation in the concept plan which reinforces uncertainty. If the link road is shown to be necessary to be delivered in full beyond Bayswater Road, we consider that this would be best brought forward as an integrated part of a future expansion of the allocation of Land North of Bayswater Brook (Land North of Headington). We consider that the expansion would, in fully integrating and supporting the link road east of Bayswater Road, be highly beneficial in the longer term as a multi-functional link road, which would also be valuable in supporting sustainable transport modes as well as managing residual car trips. Continued reference should be made in the policy to the link road as an (the best) option to address transport issues.

We confirm New College's continued commitment to delivering the link road, and to engaging with Lincoln College (the neighbouring landowner), Christchurch College and their consultants, Oxford City Council and Oxfordshire County Highways department to plan for the link road and associated development as and when it is required.

Education Provision

We are concerned that the reduction of educational capacity from 2 form to 1.5 form is likely to be problematic from a delivery perspective. The Local Plan OCC Education Topic Paper – EIP Doc Ref PSD9 in Section 2.1 states that:

“Where the expected population growth does not require a 2-form-entry school, it may be decided to include a 1-form entry or 1.5-form entry school within the development. However, schools of this size are more challenging to get opened, due to the lower economies of scale and greater vulnerability to population fluctuations.”

The documents also states that if a 1 or 1.5 form entry school is agreed then a site of 2.22ha will still be required to protect the ability of the school to expand in later years. The potential for expanding land at Bayswater Brook and securing a higher level of housing provision in the longer term would be advantageous in primary school provision. We would therefore encourage any subsequent master planning for the site to allow for the provision of 2FE, which would be capable in part of meeting future expansion alongside additional education provision.

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