



Planning Policy  
South Oxfordshire District Council  
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2<sup>nd</sup> November 2020

Dear Sir / Madam

**Response to the Proposed Main Modifications to the South Oxfordshire Local Plan 2035 – September 2020**

Rectory Homes welcomes the opportunity to comment on the Proposed Main Modifications to the South Oxfordshire Local Plan 2035 and wishes to make a number of representations as set out below.

Established in the 1990s, Rectory is a small-medium sized housebuilder operating in Oxfordshire, Buckinghamshire and the wider Home Counties. Our focus is on small to medium sites in towns and villages and we specialise in high quality housing developments built to reflect the local vernacular using locally sourced natural and sustainable materials.

We have considerable interest in the existing and emerging planning policies for South Oxfordshire having built many small developments within the District over the last 20+ years. Our representations are as follows:

We note that the Plan period has been extended by a year through **MM1** and agree this is appropriate to ensure the Plan is up to date when adopted and has at least a 15 year period from the year of anticipated adoption.

We support the Council's addition of 'contributing to tackling climate change' through **MM2** and **MM3** as one of the key objectives of the overall strategy of the Plan. This should be one of the main targets in plan making and we commend South Oxfordshire Council for incorporating this within their emerging Plan. As a local developer, we support the overall vision but highlight that any targets which relate to construction should be realistic, achievable and with absolute clarity on what the requirements are. For less viable development proposals, there should be the ability to revisit the policy requirements of renewables and / or carbon reduction targets on a site-specific basis to ensure such schemes can be delivered.

*Policy STRAT5: Residential Densities*

We agree with the removal of target densities for the majority of residential schemes as per the amendments proposed at **MM8**. The density of proposed developments should be dependent on

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site specific matters such as opportunities and constraints which will differ from site to site, and also be reflective of densities in the surrounding area. Paragraph 122 of the NPPF requires local planning authorities to support schemes that make efficient use of land therefore a target-driven policy for all settlements in the District is considered both inappropriate and unnecessary.

We further agree that developments on sites which are in towns and villages that are served by public transport or with good accessibility by foot or cycle to the town centres of Didcot, Henley, Thame and Wallingford, or a district centre within Oxford City should strive to achieve a density of 45 dph as a minimum. This will help direct the majority of development to the more sustainable locations within the District. The density of development on sites in other locations such as villages which are more peripheral to larger service centres will be captured by the rest of the criteria of STRAT5 which seeks to ensure the potential of the site is maximised based on the relevant planning considerations, in line with paragraph 122 of the NPPF.

#### *Policy H3: Market Towns*

We welcome the addition of wording through **MM25** which highlights the housing requirement specified in the Plan for market towns to be a minimum figure. However, we still consider the figure attributed to Thame to be disproportionate compared to the other market towns and insufficient given its sustainability credentials. Whilst we understand that the overall housing requirement for Thame is not subject to consultation on the proposed main modifications, we consider that the policy could be amended further to ensure sustainable development within Thame will be supported by the Council and ensure that this is reflected within the forthcoming revision to the Thame Neighbourhood Plan, particularly as amended wording at **MM2** states 'support growth in locations that help reduce the need to travel'. Thame is clearly on these locations.

Our concern is that the policy as proposed for amendment does not go far enough to maximise the opportunity of Thame's sustainability credentials and that the emerging revision to the TNP could be allowed to be unduly resistive to otherwise sustainable speculative applications which could benefit the Town.

#### *Policy H4: Housing at Larger Villages*

As per Policy H3, the housing requirement for the larger villages should also be specified in the policy wording to be a minimum figure and this should be added as part of the modifications proposed at **MM26**.

#### *Policy H10: Exception Sites and Entry Level Housing Schemes*

We support the addition of entry level housing schemes as part of Policy H10 as proposed through **MM23 and MM28** as these schemes provide valuable opportunities to help deliver a specific type of housing need and bring forward suitable sites on the edge of settlements for development.

The sentence at criteria iv) within point 3 of the Policy does not appear complete. This will need to be corrected when the Plan is finalised for adoption to avoid confusion.

We trust you will consider the above representations and look forward to receiving your formal acknowledgement.

Yours faithfully



Steven Kerry MSc MRTPI  
Planning Manager