

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" value="Ms"/>	<input type="text"/>
Full Name	<input type="text" value="Joanne Russell"/>	<input type="text"/>
Organisation (if relevant)	<input type="text" value="Stoford Developments Ltd"/>	<input type="text"/>
Job Title (if relevant)	<input type="text" value="Planning Director"/>	<input type="text"/>
Address Line 1	<input type="text" value="26-28 Ludgate Hill"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text" value="Birmingham"/>	<input type="text"/>
Postcode	<input type="text" value="B3 1DX"/>	<input type="text"/>
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MM25

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.

We support the Main Modification to MM25 which now refers to '*at least*' 1518 homes being delivered at Thame and that the housing requirement across the three market towns is a minimum.

We consider it is important that the policy is consistent with the NPPF and is positively framed.

(Continue on page 5 if necessary)

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MM38

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We object to the Main Modification MM38 because it is inconsistent.

The first part of the proposed changes are supported, and these refer to there being a 'minimum of 39.1ha' of employment land being provided across the District. This is positively framed and consistent with the NPPF.

However, the MM38 text goes on to recommend that the Table listing employment land requirements is updated and that Thame is listed against a figure of '**3.5ha**'.

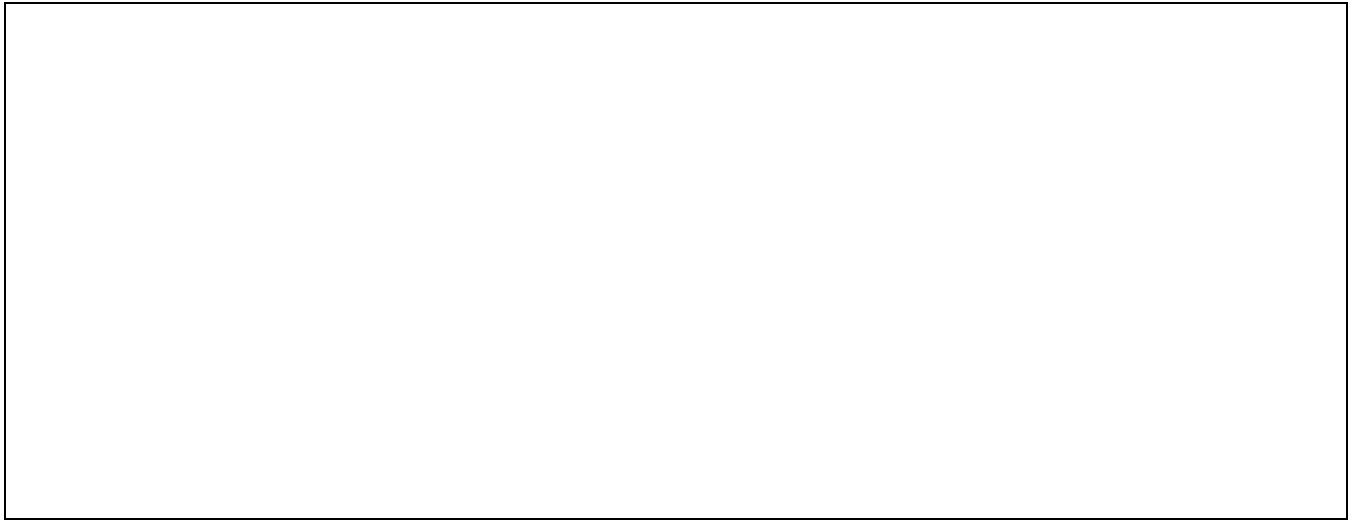
This is inconsistent with the Council's position outlined in Examination Document PSD60, which stated '**at least**' 3.5ha will be required at Thame. The reference to 'at least' is important because it sets the clear expectation that the Neighbourhood Plan should be looking to allocate more than 3.5ha and not *only* 3.5ha.

The Table 1 amendment should include a clear reference to the figures being 'at least' or minima, and this will bring the Table in line with the Policy and with Policy EMP 6 too.

(Continue on page 5 if necessary)

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MM42

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We support the amended text within policy EMP6, as proposed by Main Modification MM42.

MM42 reads

In addition to allocations in the made Thame Neighbourhood Development Plan, ~~an additional 1.6~~ **at least a further 3.5** hectares of employment land will be delivered at Thame. ~~These~~ **This** will be delivered through a review of the Neighbourhood Development Plan.

This is consistent with the Council's position outlined in Examination Document PSD60.

Stoford would suggest that further clarity and certainty can be achieved if the text were to refer to '**allocated at Thame**' as opposed to 'delivered at Thame'. It is important that the Neighbourhood Plan makes these allocations, and that landowners, developers and the community can have certainty with regards where future employment land will be located. By relying on at least 3.5 hectares of land *to be delivered* (as the text currently does), this could be as a result of changes of use, windfall development and so forth, and none of these are addressing the real need for land, upon which new purpose built premises to meet the needs of modern occupiers, can be located.

(Continue on page 5 if necessary)

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MM8 and MM20

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We support the Main Modification to policy STRAT5 and TH1, which now supports proposals that provide for a mix of uses and those that optimise the use of land and potential of the site. Given the Local Plan will require the release of greenfield sites to meet its development requirements, it is appropriate that sites are well related to existing towns and villages and served by public transport. Stoford made similar comments within our Matters Statement in respect of our site that is promoted to the east of Howlands Road. We also commented on the accessibility of this site by foot and bicycle, and it is encouraging to see this criteria referenced in the policy.

The revised criteria advises that where such site are related to towns, such as Thame, then the density of housing development shall be more than 45 dph (net) unless there is a clear conflict with delivering high quality design or other clearly justified planning reasons for a lower density. Stoford support this criterion, and will be encouraging the allocation of their site through the Neighbourhood Plan process, on the basis of a mixed use scheme, with regard to this density.

(Continue on page 5 if necessary)

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