

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="Mr"/>	<input type="text" value="Mr"/>
Full Name	<input type="text" value="N Alexander"/>	<input type="text" value="Tom Sadler"/>
Organisation (if relevant)	<input type="text"/>	<input type="text" value="Knight Frank"/>
Job Title (if relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	
Address Line 2	<input type="text"/>	
Address Line 3	<input type="text"/>	
Postal Town	<input type="text"/>	
Postcode	<input type="text"/>	
Telephone Number	<input type="text"/>	
Email Address	<input 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. 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

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

MM23 (page 86 – Policy H1)

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 refer to attached letter.

(Continue on page 5 if necessary)

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:

Thank you for your comments.

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Via email only

Planning Policy
South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Abingdon
OX14 4SB

30 October 2020
KF REF - 1077

Dear Sir/Madam

REPRESENTATIONS TO CONSULTATION ON PROPOSED MAIN MODIFICATIONS

These representations have been prepared by Knight Frank on behalf of our client Mr N Alexander, a landowner within South Oxfordshire District, in relation to the Consultation on Proposed Main Modifications for the emerging Local Plan currently at Examination.

These representations are made purely on the proposed Main Modifications and therefore do not relate to any other previous consultation exercises.

New Local Plan Schedule of Proposed Main Modifications September 2020

In the first instance, the direction of the Plan's strategic objections, particularly with regard to the new number of dwellings to be delivered over the plan period (MM5 – Policy Strat2), is largely supported.

However, we consider the proposed modification of the wording of Policy H1 fails to adhere to the objectives of the National Planning Policy Framework.

As such, we provide our comments on the relevant proposed modifications in the subsequent sections below.

Policy H1: Delivering New Homes

Part 3 of Policy H1 states:

“3. Residential development on sites not allocated in the development plan will only be permitted where:

...iv. Infilling and brownfield sites within smaller and other villages as defined in the settlement hierarchy; or (our emphasis)

...vii. It would bring redundant or disused buildings into residential use and would enhance its immediate surroundings; or”

Furthermore, Part 4 of Policy H1 now states:

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“The residential development of previously developed land will be permitted within and adjacent to the existing built up areas of towns, larger villages and smaller villages. (Our emphasis) The Council will also support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”.

This differs from the previously proposed wording which included a clause accepting that previously developed (brownfield) land sites suitable for residential development may be located in places other than ‘within and or adjacent to existing built up areas of towns, larger villages and smaller villages’.

Paragraph 117 of the National Planning Policy Framework (NPPF) states that ‘*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses...Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land*’ (Our emphasis).

Clearly, and as is well documented, National Planning Policy promotes the effective use of land which includes the development of previously developed (brownfield) land for housing purposes, subject to meeting the requirements of other policies. Therefore, this could (and should) include the development of suitable sites outside of existing settlement boundaries for residential use.

Clearly, Policy H1 is now worded in such a way that it does not make ‘as much use as possible’ of previously developed or brownfield land, and fails to acknowledge that some brownfield sites not located within or adjacent to existing settlements are suitable (and should be supported) for residential development.

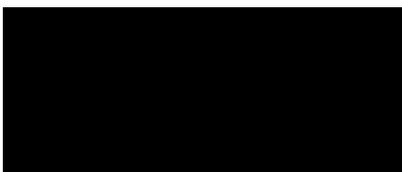
On this basis, we consider the amendment of Policy H1: Part 4 to be contrary to the Framework and the national strategic objective for significantly boosting the supply of new homes, particularly on previously developed (brownfield) sites provided they can meet the other objectives and policies of the Plan. Furthermore, we also consider the wording “*The Council will also support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.*” to be unclear in that it does not specify whether ‘support’ will only be given for such sites which are within or adjacent to settlements, or for other suitable sites further from settlement boundaries.

As such, we consider Policy H1: Part 4 should be amended to include a clause to the following effect:

“Development proposals for new housing outside of Settlement Boundaries will only be permitted where they are on previously developed land provided that they do not result in an isolated form of development and the proposed use and scale of development is appropriate to the site’s context. Such development proposals must also satisfy other relevant policies within the Plan particularly with regard to safe and sustainable access to services and facilities and safeguarding the natural and historic environment.”

We trust the above is clear, however, if further information is required or you have any queries, please do not hesitate to contact me.

Yours faithfully,



Tom Sadler MRTPI
On behalf of Knight Frank LLP