

# Emerging South Oxfordshire Local Plan Proposed Main Modifications Consultation

## Part A - contact details

Q1. Are you responding as an:

Business / Organisation

## Business / organisation contact details

Q4. Due to statutory planning regulations, a name and means of contact is required for your comments to be considered:

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## Part B - your comments

Q5. 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 as amended by Erratum Schedule of Policies Map Changes Sustainability Appraisal Addendum Habitats Regulations Assessment Addendum If you wish to provide comments on more than one proposed main modification or document, you will be given the option once you have completed this section. Please select the document you wish to comment on using the drop-down menu below:

Schedule of Proposed Main Modifications

Q6. Which Main Modification number or consultation document are you commenting on? 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 click here to view 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

MM5, MM8, MM9, MM21, MM23, MM25, MM30, MM28, MM33, MM30, MM47, MM68, MM73, MM76

Q7. Please provide your comments in the box 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. You will also be able to upload any supporting documents using the button below.

See attached PDF

Q8. If your comments are more than 500 words long, 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.

*No Response*

Q9. Please upload any supporting documents below:

- File: WTC Comments on proposed Local Plan modifications 02-11-20.pdf

# Attachment 1

## Comments on proposed Main Modifications (MM) to South Oxfordshire Local Plan 2034

Prepared by the Wallingford Neighbourhood Plan Steering Group on behalf of Wallingford Town Council

2nd November 2020

MM number	Local Plan Policy or paragraph number	Comments on proposed modification
MM5	Para 35	<p>These figures are unrealistic</p> <p>The change to para 84 show that the average annual delivery between 2011 and 2020 has been around 800 homes per year. This means that to achieve the 900 home per annum average to 2026, delivery rates between now and 2026 need to be 1050 per annum.</p> <p>Delivery above this rate has only been achieved in 2 of the last 9 years, and it relies on delivery on some of the new strategic sites by 2022/23. This is not practical and will result in speculative development being granted on appeal not in accordance with the plan strategy.</p> <p><b>Change requested</b></p> <p>Delivery is pushed further out in the plan period and should not require new strategic sites to deliver homes in less than 5 years.</p>
MM8 bullet 3	STRAT 5 Density	<p>Density is not a strategic matter as identified in NPPF paragraphs 20 and 21. Since densities for the strategic sites are now set out in the individual site policies this policy should be moved to Chapter 5 or Chapter 9 where it can be combined with policy DES 8.</p> <p>This density requirement in paragraph 3 is very specific and does not leave flexibility for neighbourhood plans and local communities to determine what is appropriate in their local area. The policy is therefore continues to be in conflict with national policy.</p> <p>The policy does not add the flexibility that the Inspector has asked for as a minimum density is still set out in the policy.</p> <p>Previously STRAT 5 only applied to major development, this policy now applies to all development so has introduced a more restrictive approach for small scale developments. The Inspector's criticism of the policy at paragraph 17 of his initial comments has not been addressed.</p> <p>MM10 and the policy for the Chalgrove strategic site for example seeks an average density (net or gross – not specified?) of between 35 and 50dph. With higher densities in the centre and lower densities towards the boundaries of the site. The policies for Culham and Berinsfield take similar approaches. These large strategic sites have a far greater capacity to accommodate higher densities and should have better public transport connections than small market towns with important historic centres and often limited public transport connections. Why are potentially higher densities being required on smaller and non-strategic sites in market towns?</p> <p>The Grenoble Road and Bayswater Brook policies do not include an overall density figure, with Bayswater Brook having a minimum of 45dph along</p>

		<p>transport corridors and lower density elsewhere to take account of heritage and biodiversity concerns.</p> <p>Section 11 of the NPPF on Making effective use of land recognises that undeveloped land can perform many useful functions in supporting development, this is not reflected in the specific nature of the policy.</p> <p><b>Requested change:</b>  <b>Move policy to Chapter 9 and combine with DES 8</b>  Delete - <del>It is expected that these sites will accommodate densities of more than 45 dph (net) unless there is a clear conflict with delivering a high quality design or other clearly justified planning reasons for a lower density.</del></p>
MM9	STRAT 6	<p>The plan should set out the compensatory improvements needed to make the Green Belt boundary changes acceptable. The Green Belt housing proposals will have a very substantial impact on the landscape character around Oxford. This afterthought addition is too woolly and does not provide clear guidance on this important issue and will not result in the quality and comprehensive improvements needed for such a substantial loss of Green Belt. NPPF paragraph 138 is clearly signifying compensatory improvements to the remaining Green Belt not just on site landscaping.</p> <p><b>Requested change:</b>  The plan should set out the compensatory improvements needed to make the Green Belt boundary changes acceptable. Specific compensatory improvements should be included in the monitoring and review items in Chapter 12.</p>
MM21	Para 4.140	<p>The paragraph should be more ambitious.  Change requested:  .. The Council <del>encourages</del> <b>expects that</b> landowners <del>will to</del> discuss development proposals with the Town Council....</p>
MM23 MM25 MM30	Hi, H3, H13 and page 109 Specialist housing for older people.	<p>There are references to this in 3 policies, it would be better to just include it in one place, however if it is retained in all 3 policies the wording should be consistent.</p> <p>H1 Para 3 bullet ii indicates that specialist housing for older people will be granted on unallocated sites. There is no evidence to support random permissions for specialist housing, as worded the policy is likely to result in unneeded permissions providing a route to circumvent planned site allocations. The policies should be limited to areas where a need has been justified.</p> <p><b>Changes requested:</b>  H1 bullet 3  It is for specialist housing for older people <b>and there is a demonstrable need for such housing in that area and is</b> in locations with good access to public transport and local facilities;  H3 <b>delete bullet 2</b> as the requirement for older people’s housing is repeated in policy H13 and other needs in H10.</p>

		<p>H13 1. 1 Encouragement will be given to developments which include the delivery of specialist housing for older people in locations <b>where there is a demonstrable need for such housing and where there is with</b> good access to public transport and local facilities.</p> <p><b>2 Where there is a demonstrable need</b> local communities will be encouraged to identify suitable sites for specialist housing for older people through the Neighbourhood Planning process.</p> <p>Page 109 New paragraph after 5.73 - The private sector is a key player in bringing forward specialist schemes for older people, and full encouragement is given to such schemes <b>where there is a demonstrable need for such housing in that area</b> and on sites close to public transport and local shops and facilities.</p>
MM25	H3	<p>At all other places in the plan the phraseology 'approximately' or 'around' xx number of homes shall be provided. There is also an emphasis on the numbers being minima in para 5.17.</p> <p>Policy H3 indicates that a '<b>minimum</b>' housing requirement .... And at Henley, Thame and Wallingford says 'at least' , this is not a consistent approach with the remainder of the plan and together with the emphasis on the numbers being minima at para 5.17 and in table 5d therefore suggests that more housing in the market towns is likely to be appropriate. This is not the thrust of the plan or of the Inspector's recommendations more generally.</p> <p><b>Changes requested:</b> The reference to housing numbers being minima should be included as a general statement at the start of the housing section rather than just relating it to the numbers for the market towns. The market towns section should then refer to housing numbers as 'around' or 'approximately' in the same way as is done in the remainder of the plan.</p> <p>Whilst accepting that the housing numbers in H3 are minima the revised wording does not reflect the Inspector's overall assessment of the potential at the market towns. In order to present a balanced view it would be useful to include elements of the Inspector's assessment in the supporting text, in particular:</p> <p>'The market towns of Wallingford, Henley-on-Thames and Thame have seen very considerable growth and have a large volume of commitments. They do not represent a reasonable alternative to the strategic allocations, partly because they are located some distance away from major centres of housing and employment, and partly because of the need to protect their character and their historic centres and ensure that their community facilities do not come under excessive pressure.</p> <p>A starting point of 15% growth to the 2011 existing housing stock plus the requirements from the Core Strategy, to be delivered through the</p>

		neighbourhood plans, is a reasonable approach which will result in proportionate growth depending on the existing size of the town.'
MM28	Policy H10 Exception sites and Entry Level Housing Schemes Bullet 2.ii	<p>Paragraphs 1 and 2 indicate that this policy is looking to achieve small scale schemes and therefore that these may be located outside existing settlements.</p> <p>Bullet 3.ii then introducing a size limitation of 1h or 5% of the size of the existing settlement. There is no justification for these sizes, and they would be likely to result in large scale and major development proposals with significant impacts. In the market towns this could result in proposals of over 2 or 300 homes. This is inconsistent with the first line of the policy which refers to 'small scale' .</p> <p><b>Change requested</b> Delete '<del>cumulatively no larger than 1 hectare in size or exceeding 5% of the size of the existing settlement;</del></p>
MM33		<p>Previously developed land includes buildings</p> <p>Change requested Within smaller villages and other villages, development should be limited to infill and the redevelopment of previously developed land <del>or buildings.</del></p>
MM39	EMP3 iii	<p>The introduction of clause iii to ELP EMP3 opens the door to significant loss of employment land contrary to the aims of the plan. In specific cases where living conditions of residents close to unneighbourly uses was an issue earlier local plans have specifically allocated those unneighbourly sites for other uses.</p> <p><b>Change requested</b> If this criteria is included it should to be prefaced by '<b>In exceptional circumstances where a</b> development would ...'</p>
MM47	EMP11	<p>This modification at i) seems to have lost the link to built areas</p> <p>Change requested: Add to end of i) <b>where these are well related to existing settlements or groups of rural buildings.</b></p>
MM68	DES 8	See comments on MM8 regarding STRAT 5
MM73	TC1	<p>Since some of this floorspace may now arise from conversions of employment buildings how will floorspace be counted? And is E use floorspace included in both the retail and employment floorspace figures? Greater clarity is needed on how the use classes order changes will affect floorspace requirements.</p>
MM76	TC5	<p>The Wallingford Neighbourhood Plan identifies a slightly different area as the Primary Shopping Area, in order to avoid any confusion or conflict it would be better to use the Wallingford Neighbourhood Plan defined area which is locally defined. An updated map was submitted by the Town Council as part of the previous consultation but appears to have been disregarded without comment.</p>

## Comment again, or finish?

Would you like to comment on another main modification or supporting document?

No, I'm ready to submit my comments now and finish the survey