



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

18 February 2019

Dear Sir/Madam,

Please find attached Homes England's representation to the South Oxfordshire Local Plan 2034. This response is made by Homes England in its capacity as the Government's Housing Delivery Agency tasked with accelerating housing delivery, ensuring more people have access to better homes in the right places. A separate response has been made by Homes England in its capacity as land owner / promoter of Chalgrove Airfield.

Homes England welcomes the opportunity to comment on the South Oxfordshire Local Plan 2034 and will engage constructively, actively and on an on-going basis in relation to strategic matters in the preparation of the plan.

To plan for enough new homes to be built quicker and in the right places Homes England encourages SODC to support innovative forms of housing delivery including, off site manufacture, self-build, custom build and a direct approach to commissioning and provide opportunities for small and medium sized house builders. Increasing the supply of new housing will also assist the local authorities to meet both market and affordable housing needs of existing and new communities.

South Oxfordshire faces a series of acute housing issues. It is clear that South Oxfordshire District Council (SODC) is making housing a priority and Homes England is fully supportive of SODC's ambitious plans for housing and economic growth in South Oxfordshire. The Local Plan through to 2034 will ensure the Objectively Assessed Housing Needs of South Oxfordshire. As partners of the Oxfordshire Housing and Growth Deal, SODC is also committed to deliver 100,000 new homes across Oxfordshire by 2031, including helping Oxford City meet its housing contribution to the Growth Deal, unlocking significant infrastructure investment and ensuring that SODC can continue to maximise its contribution to UKplc, through high value economic growth.

The scale of growth set out in the SODC Local Plan will contribute to and provide a strong basis upon which to take forward the Government proposals for the Oxfordshire – Cambridge corridor (OXCAM) with the long term ambition to support 1 million homes.

In October 2018, Homes England published its five year Strategic Plan, which set out the Agency's role in increasing housing land supply and accelerating housing delivery to meet the Government's target for 300,000 new homes a year by mid 2020's. Homes England is committed to working in partnership with

South Oxfordshire, Oxfordshire County Council and other stakeholders to help South Oxfordshire deliver on its ambitions, and is already actively involved through the following ongoing work:

In December 2015, the Government announced that Didcot had joined the Garden Communities programme, based on a bid to build 15,000 homes and deliver 20,000 jobs by 2031. Didcot Garden Town is a locally-led and ambitious proposal for new homes and jobs located in and around Didcot, with new neighbourhoods to the North, East and West of town, each being fully integrated with existing communities in Didcot and nearby employment sites. Of equal importance to Homes England, high quality design and exemplary place making are embedded from the outset. Homes England has offered support and guidance to the Didcot Garden Town delivery team, helping the project progress a vision, strategy and project action plan. This work led to the publication of the Didcot Garden Town Delivery Plan in October 2017 and envisions self-sustaining and mixed-use master plan principles spread over 60 projects needed to help deliver Didcot Garden Town.

The Delivery Plan considers funding needed for infrastructure to deliver the planned growth in housing, particularly for transport infrastructure. Homes England is therefore supporting the Oxfordshire partners, including SODC in their bid to the Housing and Infrastructure Fund (HIF) including through co-development of a detailed business plan to secure £171 million for transport improvements including the following: Didcot Science Bridge; A4130 dual carriageway; new River Thames crossing at Culham and; the Clifton Hampden Bypass. These key transport infrastructure projects were envisioned in the Delivery Plan and will support the delivery of over 22,000 homes in Didcot, Culham, Harwell and Berinsfield.

Homes England is continuing to support SODC and the Vale of White Horse District Council in implementing the Garden Town Delivery Plan. Didcot Gateway is a key priority for SODC and Homes England. Homes England is working closely with SODC to produce a revised delivery strategy for land currently owned, underpinned by a revised comprehensive masterplan for the site which identifies the most appropriate mix of uses and allows for a phased delivery.

Homes England is also supporting SODC and its partners through representation on the Didcot Garden Town Advisory Board.

Looking further ahead Homes England is working with SODC and partners on potential strategic land acquisitions, including land at Berinsfield to accelerate delivery of new homes. This allocation will be expected to deliver approximately 1,700 homes within the plan period. Proposals to develop Berinsfield will also be expected to deliver: 5 hectares of employment land, infrastructure to assist in regenerating the village, including shops, schools, and community infrastructure and all necessary transport infrastructure including upgrades to junctions along the A4074 and contributions towards the Clifton Hampden bypass (see also related HIF support work above).

Homes England are happy to work with SODC moving forward to identify other opportunities to deliver new homes across the plan period.

Yours faithfully,



Ken Glendinning
Head of Strategic Land
Homes England

South Oxfordshire Local Plan 2034

Publication Version

Representation Form

Please return by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk

This form has two parts:

Part A – contact details

Part B – your comments / participation at oral examination

Part A

Are you responding as an: (please tick)

Agent

Business or organisation

Individual

Due to the plan-making process including an independent examination, a name and contact details are required for your comments to be considered. If you are acting on behalf of another organisation, please provide their details in column one and your company name and contact details in column two.

	1. Personal Details	2. Agent Details (if applicable)
Title	<input type="text" value="Mr"/>	<input type="text"/>
Full Name	<input type="text" value="Ken Glendinning"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Head of Strategic Land"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Homes England"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<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"/>	<input type="text"/>
Postcode	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text" value="Ken.Glendinning@homesengland.gov.uk"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

Policy STRAT 1: The Overall Strategy

Do you consider the Local Plan and supporting documents:

(1) are legally compliant Yes No Don't know

(2) are sound Yes No Don't know

(3) comply with the Duty to Cooperate Yes No Don't know

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Homes England considers that the policy is sound, legally compliant and in general conformity with the guidance contained in the NPPF.

Homes England supports the overall strategy of the emerging Local Plan which is to provide new housing through large strategic allocations. This approach is robust as it seeks to promote sustainable patterns of development, delivering new communities alongside Neighbourhood Plans, which communities across South Oxfordshire are pro-actively preparing.

Within this context, the policy sets out a well justified and sound approach to meeting both SODC's locally arising housing need and wider housing needs identified and apportioned through the Oxford Housing Deal. The additional requirement to meet Oxford City Council's unmet housing needs have been made explicitly clear, as is the strategy for this need to be met through strategic allocations on the boundary with the City.

It is noted that the strategy promotes a logical growth arc from west to east, underpinned by clear strategy for delivery and infrastructure investment. While understandably, the strategy focuses the majority of development in and around Oxford City and Science Vale, it is also noted that the strategy ensures there is an appropriate balance of complimentary growth across other parts of the district, ensuring that all housing needs are met. It is considered that this approach positively plans for the delivery of desperately needed new homes against the backdrop of the current housing crisis

Homes England in its role as the Government Agency tasked with delivering new homes supports SODC's aspiration to work alongside partner agencies, neighbouring local

authorities, communities and other stakeholders and considers this approach is imperative in securing successful future growth for the District. Homes England is already working with SODC and Oxfordshire County Council to support the increased delivery of housing within the district and will continue to work with the authorities throughout the plan period, utilising its investment programmes, industry influence and other powers wherever possible to help ensure the housing ambitions of the authority are met.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

If you wish to comment on one of the evidence documents or the policies maps, please state the document title as well as the paragraph or policy reference.

Document / Policy / Paragraph:

Policy STRAT2: South Oxfordshire Housing and Employment Requirements

Do you consider the Local Plan and supporting documents:

(1) are legally compliant Yes No Don't know

(2) are sound Yes No Don't know

(3) comply with the Duty to Cooperate Yes No Don't know

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Homes England considers that the policy is sound, legally compliant and in general conformity with the provisions found within the NPPF.

Homes England considers the approach taken to outlining housing need within the District is sound. The pro-active approach taken by SODC is in line with the requirements of the Government Agenda to increase housing delivery, the provisions of the NPPF and good planning and placemaking. By setting ambitious housing delivery targets, SODC is clearly seeking to do its part to address the ongoing housing shortage. The ambitious housing targets also take into account the wider Oxfordshire Housing and Growth Deal and the delivery of 100,000 new homes across Oxfordshire between 2011 and 2031; as well as recognising the opportunity for the District to contribute to the longer term vision for the OXCAM Corridor.

The NPPF (paragraph 11) seeks, and this is set out in paragraph 4.15 of the emerging Local Plan, that local planning authorities should, as a minimum provide the Objectively Assessed Need (OAN) for market and affordable housing in their area as well as those for neighbouring authorities unable to meet their OAN. The approach set out within this policy and clearly explained within the policy supporting text seeks to deliver both SODC's need and meeting Oxford's unmet need is explicit.,

The background to the strategy to meet SODC's housing (and employment) needs is set out at paragraphs 4.15-4.39, with particular reference to the SHMA, Housing Growth Deal and the Oxfordshire Growth Board's Memorandum of Cooperation to accommodate unmet housing need from Oxford City. This results in a housing requirement for SODC in the plan period of 22,775.

Given the current housing shortage in England, and the acute demand for housing in Oxfordshire and South Oxfordshire, Homes England considers the approach taken by SODC in the preparation of their Local Plan is justified and proactively prepared, resulting in a sound approach to housing delivery.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

For comments on the Local Plan, please provide the paragraph or policy to which your comments relates.

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Document / Policy / Paragraph:

STRAT4: Strategic Development

Do you consider the Local Plan and supporting documents:

(1) are legally compliant

Yes

No

Don't know

(2) are sound

Yes

No

Don't know

(3) comply with the Duty to Cooperate

Yes

No

Don't know

Please provide further information in relation to the previous question. e.g. why you do or do not consider the Local Plan to be legally compliant or sound.

Homes England considers that the policy is sound, legally compliant and in general conformity with the provisions found within the NPPF.

As set out in our response to STRAT2, the Local Plan provisions for a high level of residential delivery over the plan period is commended, and STRAT4 is supported as it encourages a comprehensive framework to ensure the delivery of the highest quality strategic developments within SODC. Homes England considers that this approach is sound and that the use of strategic development allocations, provides the strongest basis against which the necessary step change in delivery can be achieved.

It should be noted that the recent Letwin review, recognises the role of Local Planning Authorities in promoting strategic sites, and enabling more diverse and co-ordinated delivery to achieve the necessary increase in housing delivery. As detailed proposals for each of the strategic sites emerge, SODC should consider how it can be best placed to maximise the contribution of the strategic sites towards meeting its housing needs at pace.

Please set out any modifications you consider necessary to make the Local Plan legally compliant or sound, having regard to your comments above. (NB - any non-compliance with the duty to co-operate is incapable of modification at examination).

It will be helpful if you could put forward your suggested wording of any policy or text as precisely as possible.

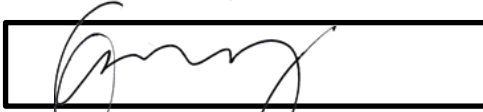
Would you like to participate at the oral part of the examination, which takes place as part of the examination process? *

Yes

No

* **Please note:** the inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the public hearing.

Signature:


(this can be electronic)

Date: 16 February 2019

Sharing your personal details

All comments will be submitted in full to the Secretary of State alongside a submission version of the Local Plan. The Secretary of State will appoint an independent planning inspector, who will carry out an examination of the plan.

Your name, contact details and comments will also be shared with the planning inspector and a programme officer, who will act as a point of contact between the council, inspector and respondents. This means that you will be contacted by the programme officer (and where necessary the council) with updates on the Local Plan. This is required by Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Section 20 of the Planning and Compulsory Purchase Act 2004.

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. South Oxfordshire District Council will hold the data for six years after the plan has been adopted.

Comments submitted by individuals will be published on our website alongside their name only. No other contact details will be published. Comments submitted by businesses and/or organisations will be published on our website including contact details. If you would like to know more about how we use and store your data, please visit www.southoxon.gov.uk/dataprotection

Future contact preferences

As explained in our data protection statement, 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 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

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Alternative formats of this form are available on request. Please email planning.policy@southoxon.gov.uk or call 01235 422600 (Text phone users add 18001 before you dial).

Please return this form by 5pm on Monday 18 February 2019 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email it to planning.policy@southoxon.gov.uk.