Neighbourhood Plan Continuity Committee

Date:	**26 September 2017**
Title:	**SODC Local Plan 2033: Summary of Second Preferred Options Consultation Report, September 2017**
Contact Officer:	**Graeme Markland, Neighbourhood Plan Continuity Officer**

Purpose of Report

1. To provide a partial summary of the representations made by the Town Council to SODC on their Preferred Options Draft Local Plan. This was subject to a seven-week public consultation between March and May 2017.

This document does not aim to review the published analysis of TTC's representations, as undertaken by SODC officers. It compares comments made by TTC in two key topic areas, housing and employment, against the text and policies in the newer, Publication draft Local Plan.

In total, 7,666 comments were made from 1,369 consultees. It is noteworthy for Thame's future Neighbourhood Plan consultations that just 11% of representations were made via physical letters, with 73% of responses being sent electronically via e-mail. Some 16% of users completed their response using the on-line web-form.

Positive changes that align with our representations are highlighted in **green.**
Neutral changes are highlighted in **blue.**
Harmful changes / no change are highlighted in **red.**

2. Comments made about housing

TTC 3: Para 4.9 - In applying a blanket 15% growth on census dwelling numbers, housing need is being dispersed without regard to the housing / employment balance. It is not clear if this is where people would preferentially want to live. SODC: text and strategy unchanged.

TTC 4: STRAT1 - All that you have suggested is the provision of new housing, and a degree of employment that we do not believe matches local need. SODC: text and strategy unchanged.

TTC 7: STRAT2 - The review period suggested – 5 years – does not take account of the outcomes from the Housing White Paper. SODC: strategy unchanged.

TTC 8: Para 4.28 - Oxford's unmet need remains unresolved. The Town Council does not believe you have demonstrated constructive and ongoing engagement with Oxford City in this matter. SODC: text and strategy unchanged.

TTC 9: Para 4.29 - SODC had agreed to work through the Growth Board in allocating Oxford's unmet need. In unilaterally deciding to only meet part of the number allocated by the Board SODC is not demonstrating constructive engagement. SODC: text and strategy unchanged.

TTC10: STRAT3 - If Oxford's unmet need is not allocated to a specific site then it is dispersed. The need represents people who wish to work and live in the City. It is therefore not sustainable to disperse them around the District. SODC: No change to text or strategy, but removed a paragraph that allocated 50% of any "surplus" housing provision to Oxford City's unmet need.

TTC 12: Para 4.62 – Strike out superfluous word "…~~existing~~ Scheduled Monument". SODC: No change made.

TTC13: Para 4.67 – Strike out superfluous word. SODC: whole paragraph changed.

TTC14: Para 4.67 – References to most facilities being within 10 minutes' walk or public transport journey is out of date. SODC: All reference to accessibility of services deleted.

TTC16: General comment, the method of housing allocation across the towns and villages is unsound. It is not based on an understanding of available sites or broad locations, subject to a thorough understanding of local capacity and constraints, and tested via an adequate sustainability process that compares reasonable alternatives. SODC: No change to strategy.

TTC17: Para 5.1 - You are not investigating if homes in the towns and larger villages are in the most suitable or sustainable locations. These have proved desirable but increasingly unaffordable. SODC: text and strategy unchanged.

TTC18: Para 5.2 - You are saying that sites to be identified through NDPs are non-strategic. You job is to allocate strategic development in appropriate locations, including towns and villages. If they are non-strategic do NDPs have a duty to respond? SODC: no change to text or strategy.

TTC19: Para 5.9 – You are preparing for a drastic oversupply (1,066 p/a) that your own Sustainability Appraisal says would cause harm. The Plan will be found unsound. SODC: no change to text or strategy (new SA has been produced, but not yet analysed by TTC).

TTC20, TTC24, TTC25: Para 5.12, Para 5.27 and Para 5.28 – The altered allocation strategy means 166 extra homes for Thame, over the previous consultations. This has not been subject to any test of capacity or constraints. SODC: no change to text or strategy.

TTC21: Para 5.14 – In admitting the 15% distribution does not take account social, economic or environmental factors that might constrain or prevent development – or the availability of sites – the LPA is not making strategic allocations as required by the NPPF. SODC: This paragraph has been amended and states that an assessment has been undertaken to check the capacity of the towns to accommodate growth. This took account evidence collected as part of the plan-making process, including land availability, infrastructure delivery, landscape capacity. This informed the number of homes for each town.

TTC22: Para 5.17 – Why is recognition that development in towns should be proportionate, and dependent on existing infrastructure, as it is in the larger villages? The degree of growth remains untested. SODC: The statement has been changed for larger villages, in line with the statement for towns, stating that an assessment has taken place that has led to the number of homes being made for each village.

TTC23: Para 5.19 – If you allocate sites in a NP area, where the NP group make insufficient progress then you should do so on the basis of an up to date SHLAA. SODC: no change to text or strategy.

TTC26: General comment – There is no recognition of planned and potential expansion at and around Haddenham. SODC: No change to text or strategy. No mention of Aylesbury Vale or Wycombe.

TTC27: General comment – There is no mention made of village growth around Thame, e.g., the allocated and significant windfall developments at Chinnor. The impact of this growth is not acknowledged. SODC: No change.

TTC28: Policy H3 – We object to the idea that the market towns will collectively deliver a minimum of 1,155 homes. Shortfall in one Town will fall on the others. Such growth would be untested in capacity terms. SODC: have placed the totals per town into Policy H3. This helps, but better clarity could be provided.

TTC29: Para 5.12 – A one year deadline for any Neighbourhood Plan to be revised is inadequate for most NP Groups. It is an arbitrary deadline. SODC: have brought this into Policy H3, and made it clear the NP will need to have reached submission stage in order to count.

TTC30: Policy H1 – SODC should be aware that case law has stated that gardens in rural areas are considered brownfield land, and are therefore now vulnerable to development (link to case supplied). SODC: no change to text or strategy.

TTC32: Policy H2 – All "…provision will be made for at least xx new homes…" policies should set a maximum density per site. This will prevent speculative applications that adversely affect the amenity of an area, or over-provision of a particular dwelling type. SODC: no change to text or strategy.

TTC 33: Policy H4 – The words "minimum" and "collectively" should be removed from the Policy. The risk is introduced of unconstrained growth within certain villages in order to make up the shortfall from others, without any capacity based checks. SODC: no change to text or policy.

TTC34: Policy H10 – The word "minimum" should be removed. No evidence has been offered to suggest the growth will continue. A strategic approach is required. SODC: have added text to the Policy in order that those areas with a NDP will plan for at least a 5% increase in dwelling numbers. Where there is no NDP an increase between 5 – 10% of dwelling numbers above those of the 2011 census will be permitted on suitable sites / infill development.

TTC 35: Policy H14 – Self-Build and Custom Housing – you cannot state NDPs will provide the sites for self-build and custom build housing. This has clearly been defined as a function of the LPA. SODC: no change to text or strategy (note: the amendments on numbers should give 160 homes, not 200 as stated).

TTC 36: Policy H18 – Ensure that the importance of private historically significant views are recognised. SODC: no change to text or strategy.

3. Comments made about employment

TTC 5: Thame needs more business floorspace of all types. SODC: Mention of smaller, flexible office development in the market towns has been removed.

TTC 6: We welcome this recognition of the demand for employment land and floorspace in Thame. SODC: Have amended policy in line with the 2015 Employment Land Review – Thame is now allocated 1.6ha, 0.4ha less than at the Preferred Options stage.

TTC 42: Objectives 3.1 – 3.3 area laudable but not compatible with the Plan's strategy as it will boost out commuting and cause an imbalance in our housing/jobs ratio. SODC: Have amended Objective 3.3 to read "... recognising we cannot determine where people work – some of whom will choose to travel to employment locations beyond our district…"

TTC 43: Suggested a District-wide assessment of employment land with a policy to replace the worst, after new provision has been made; and to commit to working with owners to improve those in need of regeneration. SODC: No recognition this is a District-wide issue, but repeats in supporting text that Thame Industrial Estate, parts of Ryecote Lane, Station Yard and the Aylesbury Road industrial estate need upgrading.

TTC 44: Evidence suggests that new employers wishing to move to Thame are unable to find premises. SODC: Have amended policy in line with the 2015 Employment Land Review – Thame is now allocated 1.6ha, 0.4ha less than the Preferred Options stage.

TTC 45: No mention is made in Policy EMP3 of only permitting the worst employment land to be redeveloped, with a criteria-based policy. SODC: Added text to policy to seek a mixed-use scheme where employment land is under threat; failing that, those that offer employment; any scheme that improve the stock of existing land, premises and their environment will be supported.

TTC 46: Sentence repeated in Policy; amend, or removed. SODC: Sentence removed.

TTC 47: Avoid setting a minimum target for employment at Chalgrove as it may become a net importer of employees. SODC: No change to policy.

Action Required
To note the report