

South Oxfordshire Local Plan 2034

Page 3: Part A - contact details

Q1. Are you responding as an:

Business / Organisation

Page 6: Business / organisation contact details

Q4. Due to the plan-making process including an independent examination, a name and means of contact is required for your comments to be considered:

Business / organisation name Kidmore End parish council
Contact name C/O Clerk to the council Mr Penfold
Address line 1 30 Venetia Close
Address line 2 Emmer Green
Address line 3 -
Postal town Reading
Postcode RG4 8UG
Telephone number +441189473130
Email address clerk@kepc.info

Page 7: Part B - your comments

Q5. For comments on the Local Plan, please provide the paragraph or policy to which your comments relates. You can view a list of policies here. 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: local plan 2100-2034

Q6. Do you consider the Local Plan and supporting documents:

	Yes	No	Don't know	Not answered (OPTION HIDDEN FROM LIVE SURVEY)
are legally compliant?			X	
are sound?		X		
comply with the Duty to Co-operate?	X			

Q7. 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.

We do not have the legal knowledge to state whether the documents are legally compliant or not.
We do not think the document is sound there are a number of issues that are of concern to the council, explained in this response
Comply with duty to co-operate yes—
However Reading BC draft Local Plan is stating housing densities for part of Reading Golf Club, Emmer Green of between 24 and 34 houses per hectare, whereas SODC is suggesting 70 houses per hectare for Reading , this is not compatible.
We agree with strategic objectives p21

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We agree with strategic objectives p21

Q8. 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.

Housing Need and Numbers p Strat 5, p41 + p83 + SHMAA 2014

Suggested total number of houses in plan period 28,465 , p86
our calculations

The basic requirement is for 775 houses per year = 17,825

Plus the Oxford shortfall 4,950 = 22,775

Then add the Growth Deal 2,099 = 24,874

Add Change in Policy 3,326 = 28,200

However the Plan takes the houses built + plans passed to date = 15,726

Plus the Strategic Sites in the Plan Period 10,375 = 26,101

Plus an addition in the Strategic sites of 4,025 (to bring total to 14,400) = 30,126

Adding NDP's, Nettlebed and windfall, this total becomes 32,491 compared with 22,775 from the previous version, including the Oxford shortfall. This is an increase of 42%.

Why and for what purpose? Given the densities required to achieve this, the Green Belt around Oxford will become terraced housing with little green space and minimal occupant convenience e.g. on road parking, small gardens, or alternatively high rise developments in existing Green Belt.

The number of houses that are being suggested in the plan are too high, they are based on the SHMA which was completed in 2014 and therefore is nearly out of date (5 years) and will be out of date by the time this plan is ratified

The numbers for the growth deal are also based on the SHMA and too high for same reason as above.

There is an uplift of 219 from the SHMA to the standard numbers in NPPF, the uplift from the Standard Numbers and the Actual housing that is coming forward goes from 556 to 1412 per year (32491 divided by 23) - (this will then really show the significant buffer they have in their plan) and is still significantly more than the SHMA of 775 per year

$775-556= 219$ – approx 30%. it has been hard to find the evidence to explain this uplift

There are concerns around the untested level of economic growth, especially in these uncertain times, BREXIT and aftermath.

Therefore the evidence for the housing numbers are out of date, the numbers are too high and unsound

Density of housing per hectare

There are concerns about the high density of housing in rural areas and AONB – 40 in smaller villages and 35 in other villages

In smaller and other villages this is likely to be out of keeping with the other housing in the villages

Currently housing density is 25 – 30 housing density and other villages 20 density, based on infill, so large increase in density. Density significantly contradicts infill policy H16 in Smaller Villages and Other Villages.

“other locations “ Other Locations should be amended to Other Villages. Otherwise this implies that villages that are not classified or listed in appendix 7 should have this level of density. These villages are deemed to be in Open Countryside and is therefore not appropriate.

We do not understand why SODC is stipulating housing density for Reading when it has its own Local Plan, where the density is 40 per hectare

Reading local plan – Reading golf course, 3.75 hectares, suggest 90 – 130 houses = 130 houses = 35 per hectare and 90 = 24 houses per hectare, so 70 houses per hectare as SODC suggest is out of keeping with Reading and shows a lack of duty to co-operate

The Reading boundary with SODC is open countryside and is in the setting of the AONB

There are no strategic sites on the boundary with Reading

Strategic objective 1.1 is to focus growth and infrastructure on Science Vale (Page 28) therefore stating the housing density of Reading should be 70, same as other urban areas means it is not in agreement with the strategic objectives. There is no requirement in the Reading Emerging Local (stated) for SODC to take any of Reading's housing target (they have a duty of co-operation with other councils for this).

Suggested 3 bedroom dwelling with off road parking at 70 houses per hectare is not achievable in rural areas, to ensure that the character and distinctiveness of smaller villages, other villages and open countryside, particularly in the setting of the AONB and in identified conservation target area, (ENV 2) are not destroyed.

There needs to be smaller houses in rural settlements for younger and older members of the community

Redevelopment p113 policy H16

p113 – no site area limit on redevelopment, therefore this is a risk to rural areas and settlements of over development as it's a loophole

There should be a section on settlement categorization within redevelopment for open countryside, as larger plots are at risk of over development, out of character development on larger plots, this should be linked to the infill policy

There should be a working change to limit redevelopment in Smaller Villages and Other Villages to be in line with the infill limit of .2 ha (5-6 houses) and .1 ha (2-3 houses respectively).

Replacement Dwellings – Policy H18 p115

This policy could enable developers to build out of character densities on plots that are in open countryside as there is nothing linking this policy to any density commitment.

Smaller Villages H8 - p97

Agree with wording for smaller and other villages, p 97

Policy H3 - p90

Q10. Would you like to participate at the oral part of the examination, which takes place as part of the examination process?

Yes

Q11. Would you like to comment on another policy or paragraph?

No

Page 106: Future contact preferences

Q354. 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) below:

I would like to be added to the database to receive planning policy updates for South Oxfordshire