

Dear Juliet Evans,

Summertown and St Margaret's Neighbourhood Development Plan Regulation 16 consultation

Thank you for providing South Oxfordshire District Council with the opportunity to comment on the submitted Summertown and St Margaret's Neighbourhood Development Plan. South Oxfordshire District Council strongly supports neighbourhood planning as a means of empowering local communities to help direct and shape the way their areas grow and develop into the future. The council wishes to make the following comments in relation to the Summertown and St Margaret's Neighbourhood Development Plan:

Given the significant need for new homes in Oxford, and that the other Oxfordshire authorities have been asked to assist in the provision of housing to help meet Oxford's housing needs, it is disappointing that the submitted Summertown and St Margaret's Neighbourhood Development Plan does not propose to allocate any sites for residential development. Producing a neighbourhood plan provides communities with an opportunity to consider where they want new homes to be built and to allocate non-strategic sites for development. The neighbourhood forum's decision not to make any residential allocations in Summertown and St Margaret's appears to be a missed opportunity.

In addition, proposed policies HOS7 and HOS8 of the submitted Summertown and St Margaret's Neighbourhood Development Plan seek to restrict development on residential gardens. It is noted that the Oxford Local Plan Preferred Options document (Published June 2017) identifies that development on residential gardens forms an important part of Oxford's housing land supply. Paragraph 3.46 of this document states that "many developments in Oxford are small sites including conversions and garden land developments". The table for Option 52 (page 81 of the same document) goes on to identify "that garden land developments will continue to be an important source of housing sites in Oxford". The council suggests that caution is needed in respect of proposed policies HOS7 and HOS8 as they could have cumulative impacts on Oxford's housing supply.

Proposed policy HOS1 aims to increase the supply of smaller homes (1, 2 and 3 bedroom dwellings) with the aim of making new housing in the neighbourhood area more affordable. This also has potential to boost housing supply if it results in a more efficient use of land by providing a greater number of smaller dwellings in place of larger homes. However, the policy only applies to developments of 10 or more dwellings and many housing developments in the area will fall well below this threshold.

Finally, many policies within the submitted Summertown and St Margaret's Neighbourhood Development Plan appear to repeat requirements set out in Oxford's adopted Local Plan and/or national policy and guidance. This repetition is unnecessary.