

# Summertown and St Margaret's Neighbourhood Plan

## The Neighbourhood Planning (General) Regulations 2012 – Regulation 16 Representation Form

Summertown and St Margaret's Neighbourhood Forum has prepared a Neighbourhood Plan. The plan sets out a vision for the future of the Summertown and St Margaret's area and planning policies which will be used to determine planning applications determined locally.

Copies of the Summertown and St Margaret's Neighbourhood Plan and supporting documents are available to view on the City Council's website: [www.oxford.gov.uk/ssmconsultation](http://www.oxford.gov.uk/ssmconsultation)

### All comments must be received by 4pm on Friday 11<sup>th</sup> July

There are a number of ways to make your comments:

- Complete this form on your computer and email it to: [planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)
- Print this form and post it to us: FAO: Planning Policy Team, Oxford City Council, St. Aldate's Chamber, 109-113 St. Aldate's, Oxford, OX1 1BX

#### How to use this form:

Please complete Part A in full, in order for your representation to be taken account at the Neighbourhood Plan examination.

Please complete Part B on page 3, identifying which paragraph your comment relates to by completing the appropriate box.

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Patsy Dell
<b>Address</b>	Oxford City Council Planning Sustainable Development & Regulatory Services, St. Aldate's Chambers, St. Aldate's, Oxford
<b>Postcode</b>	OX1 1DS
<b>Telephone</b>	01865 252704
<b>Email (USE CAPITALS)</b>	PDELL@OXFORD.GOV.UK
<b>Organisation (if applicable)</b>	Oxford City Council
<b>Position (if applicable)</b>	Head of Planning Sustainable Development & Regulatory Services
<b>Date</b>	10 <sup>th</sup> July 2018

## General Data Protection Regulation (GDPR) 2008

We will make your comments available to the public on paper at our Council offices, and will also publish them on our website. In accordance with The Neighbourhood Planning (General) Regulations 2012, your comments will also be provided to the appointed inspector for examination. Your personal details will be used for these purposes alone.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018.

We cannot accept anonymous comments.

If you are happy for us to state your name and the first line of your address and postcode when publishing your comment(s) please tick this box:

If you would rather all personal details except a non-specific address (e.g. Oxford) removed before publishing your comments, please tick this box:

Do you wish to be notified of the following? (tick as appropriate)	
When a decision on the Neighbourhood Plan has been made by the Local Planning Authority under Regulation 19 in relation to the neighbourhood plan, to 'make' (or adopt) the Plan under Section 38A(6) of the 2004 Act.	

**If you wish to withdraw your consent to the above, you have the right to do so at any time. If you wish to do so, please state your request to withdraw your consent by emailing: [planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk).**

# Part B - DETAILS OF YOUR COMMENT

To which part of the document does your representation relate?

Page:		Section: Housing		Policies: HSO1	
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Do you support, oppose, or wish to comment in this part of the Plan? (Please tick one answer)

Support  Support with Modifications  Oppose  Have Comments

Please give details of your reasons for support/ opposition, or make comments here:

## Housing

### Spatial policies

#### Supporting text not in general conformity with existing and emerging strategic Local Plan policies:

this makes reference to a 'few large or medium sized sites in the area, such as Diamond Place, Summer Fields School land and large land holdings of land at Summer Fields School together with Wadham College and St. Johns' College. It then states that 'to all these sites, the Plan will apply appropriate neighbourhood housing policies on design, density, affordable housing, key worker homes and unit sizes'. The Core Strategy, Sites and Housing Plan and emerging Local Plan 2036 sets out detailed site allocation policies for larger sites, often with guidance on design that is specific to the site and which will directly conflict with this general statement.

#### Policy HSO1 Local Dwelling Size

**Not in general conformity with strategic Local Plan policies:** This policy does appear to be in conflict with Policy CS 23 in the Core Strategy which supports a balanced mix of dwellings. This policy is not supported by evidence that the City Council have seen that reasonably justifies an alternative local dwelling size to that proposed in the adopted Core Strategy and in particular the Balance of Dwellings SPD.

The Preferred Options for the Local Plan 2036 propose to continue to require a mix of dwellings size to meet need and prioritise larger units (3 beds +) which would be applied to larger sites with a threshold of 25 or more units. Their aim is to ensure a mix of units on larger sites. Policy HOS1 as written will not necessarily create a mix of units in a scheme. Also, it is not requiring a higher proportion of smaller units than the existing Balance of Dwellings SPD.

The City Council will be updating the evidence to support a new policy in the Local Plan 2036. Since the Plan is at the very early stages this has not been carried out yet. Suggest this policy is changed to a 'community policy' with the aim to work with the City Council to influence the mix of uses within Summertown and St. Margaret's to reflect the mix considered to be most suited.

#### Policy HOS2 Key worker and affordable housing

**Not in general conformity with Strategic Local Plan policies:** This policy is not in general

conformity and indeed in conflict with Local Plan policies as set out in the Core Strategy (CS24) and Sites and Housing Plan (HP3), and with proposals in the Local Plan 2036 Preferred Options document. Policy CS24 – Affordable Housing – sets out that “planning permission will only be granted for residential developments that provide generally a minimum of 50% of the proposed dwellings as affordable housing on all qualifying sites”. Policy HP3 – Affordable Homes from Large Housing Sites – restates the requirement for 50% affordable housing and sets out the types of affordable housing which the City Council will seek as part of qualifying residential developments. The approach in the emerging Local Plan is broadly similar to the Sites and Housing Plan, with the introduction of the concept of ‘employer-linked housing’ (as set out in the Preferred Options).

The overall policy approach to key worker and affordable housing is being reviewed as part of the Local Plan 2036. It will include key definitions, such as that for ‘key worker’ housing. Policy HOS2 is not clear about what type of key worker housing is proposed, or what type of affordable housing is acceptable. There is no mention of social rented housing.

As such this policy in the Neighbourhood Plan is not in general compliance with the present adopted policy.

#### **Policy HOS5 Protecting Family Dwellings**

**Not in general conformity with Strategic Local Plan policies:** Whilst the overall approach to protect housing does accord with Local Plan policy, the implications of this policy would have a significant impact of the provision of student accommodation and HMOs in the area. On this basis the proposed policy is in conflict with adopted Local Plan policies, in particular Policy HP5 (Location of student housing) and HP1 (change of use of existing homes) in the Sites and Housing Plan. The preferred Options document includes Option 18 which sets out considerations for a new approach to a loss of dwellings policy together with Option 21 which is concerned with the identifying suitable locations for new student accommodation in District centres, such as Summertown and on allocated sites. The proposed policy does conflict with this emerging policy direction.

#### **Policy HOS6 Character assessments**

**Not in general conformity with Strategic Local Plan policies:** This policy is in conflict with adopted Local Plan policies, in particular Policy HP9 (Design, Character and Context) in the Sites and Housing Plan. It will also be contrary to national policy in NPPF which sets out clear criteria for assessing proposals that may impact on heritage assets and the more important the asset the greater the weight of protection it should be afforded. Overall the level of protection being afforded the ‘important assets’ is similar to that of listed buildings and goes beyond policy protection within the adopted Local Plan. In determining planning applications an applicant is required to describe the significance of any heritage assets affected, including any contribution made by their setting. The effect of any development on designated assets is clear in the NPPF advice whilst the impact on non-designated assets is a matter of judgement based on both the proposal itself and the importance of the asset. This approach needs to be reflected within the policy. The importance of correctly dealing with the ‘significance’ of heritage assets in Neighbourhood Plan policies should not be underestimated. The character assessments

do provide some useful background information but suggest they would be better published as part of the evidence base rather being a spatial policy within the Plan itself.

**Policy HOS7 Density, building design standards and energy efficiency**

**Not in general conformity with Strategic Local Plan policies:** Whilst the broad approach of the policy is in general conformity with the Local Plan Policy HP9, it is contrary to Policy HP10 (Sites and Housing Plan), which does in principle grant permission for new dwellings on residential garden land. In addition some of the criteria within this proposed policy do run contrary to national policy. For example in many cases planning permission is not required to remove front gardens to provide parking.

**Policy HOS8 Back-land development**

**Not in general conformity with Strategic Local Plan policies:** This proposed policy is not in general conformity with either national planning policy or adopted Local Plan Policy. The NPPF seeks to support new housing development in principle and make efficient and effective use of land to promote sustainable development, whilst the Local Plan and in particular Policy HP10 (Developing on residential gardens) in the Sites and Housing Plan does reflect this approach by stating that permission 'will be granted on residential land' subject to criteria.

(Continue on a separate sheet if necessary)

**What improvements or modifications would you suggest?**

(Continue on a separate sheet if necessary)

If you have any additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.