

**Representor ID:** RP-145

**UI Representor ID:** 798

**UI Representation ID:** 860

**Representor Name:** Mark Schmull

**Representor Organisation:** Denison Land & Planning Limited

<b>Policy:</b> Policy GS2		
<b>Legal Compliant:</b>	<b>Soundness Compliant:</b>	<b>Duty to Cooperate Compliant:</b>
	No	
<b>Paragraph</b>		
<b>Compliance Comment</b>		
<p>The strategy for homes is too (almost solely) reliant upon large strategic sites. These large, strategic sites take many years to deliver (an average of 6-7 years to get the first homes built on sites of 1,000 + homes - see "Start to Finish 3" by Lichfields). These homes will not meet needs in the short to medium term.</p> <p>Furthermore, this strategy would not provide small and medium sized sites, as required by the NPPF paragraph 73. Para 73 requires the Plan to accommodate at least 10% of its housing requirements on sites no larger than one hectare, which this plan does not do.</p> <p>The proposal for Neighbourhood Plans, meanwhile, to "allocate for at least one new home" is not sound. Paragraph 69 requires the strategic policies to set out a housing requirement for designated neighbourhood areas. Simply stating "at least one new home" is not identifying a housing requirement for designated neighbourhood areas. Policy GS2 is not, therefore, sound, as it is not positively prepared, effective or consistent with national policy.</p>		
<b>Modification Comment</b>		
<p>Policy GS2 should be modified to include allocations for sustainable settlements, on sites which will deliver 10-50 homes, 50-150 homes, and 150-300 homes.</p> <p>It should also identify a housing requirement for designated neighbourhood areas. Settlements such as Bow Brickhill are sustainably located, with access to the mainline railway and can sustainably accommodate small to medium sites which can deliver homes in the 1-5 year period.</p> <p>This should include allocating housing within Bow Brickhill, a sustainable settlement with direct rail links.</p>		
<b>Appear at examination?</b>	No	
<b>Appear at examination reason?</b>		

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	No	
<b>Paragraph</b>		
As identified in Policies GS1 and GS2 below, we still expect local communities to plan for growth that responds to their own local ambitions and needs through Neighbourhood Plans. This includes communities within the city as well as those beyond, in Olney		
<b>Compliance Comment</b>		
The NPPF requires Local Plans (paragraph 69) to set out a housing requirement for Neighbourhood Plans. Simply "encouraging" groups to allocate housing is not sufficient and not in conformity with the NPPF. The Plan is therefore unsound.		
<b>Modification Comment</b>		
The Plan must be modified to include a requirement for small and medium sites in Policy GS2 and specific housing requirements for neighbourhood areas within the Policy.		
<b>Appear at examination?</b>	No	
<b>Appear at examination reason?</b>		