

VOWH LOCAL PLAN PART 1 EXAMINATION

HEARING STATEMENT

MATTER 1: DUTY TO COOPERATE AND OTHER LEGAL REQUIREMENTS

ON BEHALF OF REDROW HOMES

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Pegasus Group

Suite 4 | Pioneer House | Vision Park | Histon | Cambridge | CB24 9NL

T 01223 202100 | **W** www.pegasuspg.co.uk

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QUESTION 1.1 - HAS THE COUNCIL SATISFACTORILY DISCHARGED ITS DUTY TO CO-OPERATE TO MAXIMISE THE EFFECTIVENESS OF LOCAL PLAN PREPARATION IN THE CONTEXT OF STRATEGIC CROSS BOUNDARY MATTERS, INCLUDING IN PARTICULAR MINERALS AND WASTE AND HOUSING? (SEE ALSO MATTER 4). 1

QUESTION 1.2 - ARE THE LIKELY ENVIRONMENTAL, SOCIAL AND ECONOMIC EFFECTS OF THE PLAN ADEQUATELY AND ACCURATELY ADDRESSED IN THE HABITATS REGULATIONS ASSESSMENT AND THE SUSTAINABILITY APPRAISAL (SA)? DOES THE SA TEST THE PLAN AGAINST ALL REASONABLE ALTERNATIVES IN TERMS OF THE OVERALL REQUIREMENT FOR LAND FOR HOUSING AND EMPLOYMENT (SEE ALSO MATTERS 2 AND 4) AND ITS BROAD SPATIAL DISTRIBUTION (SEE ALSO MATTER 3)? 2

QUESTION 1.3 - IS IT APPROPRIATE FOR THE PLAN TO INCLUDE ONLY STRATEGIC POLICIES AND SITE ALLOCATIONS AND FOR DETAILED PLANNING POLICIES AND NON-SITE STRATEGIC SITE ALLOCATIONS TO BE DEVOLVED TO A PART 2 LOCAL PLAN DOCUMENT? IS THERE A CLEAR JUSTIFICATION FOR THIS AND DOES IT ACCORD WITH NATIONAL POLICY? 10

Question 1.1 - Has the Council satisfactorily discharged its Duty to Co-operate to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters, including in particular minerals and waste and housing? (see also Matter 4).

- 1.1 This question is addressed more fully in our statement on Matter 4. Redrow Homes believe that the Council has discharged its Duty to Co-operate in the context of housing provision. Topic Paper 1 identifies the significant work programme carried out by the Council to maximise the effectiveness of local plan preparation. Joint working on areas of common interest has been diligently undertaken for the mutual benefit of neighbouring authorities as required by paragraph 178 of the National Planning Policy Framework (NPPF).

Question 1.2 - Are the likely environmental, social and economic effects of the plan adequately and accurately addressed in the Habitats Regulations Assessment and the Sustainability Appraisal (SA)? Does the SA test the plan against all reasonable alternatives in terms of the overall requirement for land for housing and employment (see also Matters 2 and 4) and its broad spatial distribution (see also Matter 3)?

- 1.2 The Sustainability Appraisal Report for the Vale of White Horse Local Plan 2031 Part 1 (October 2014) contains an assessment of a range of options and alternatives in respect of delivering the quantum and location of new housing development. Indeed, the Sustainability Appraisal assesses nine housing delivery scenarios ranging from 13,294 to 20,560 dwellings to be delivered over the plan period.
- 1.3 The Council's approach to housing growth is clearly outlined in Chapter 11 of the Sustainability Appraisal. Redrow Homes consider that the Council's preferred option for housing growth has been evaluated against a range of potential alternative scenarios.
- 1.4 The Sustainability Appraisal takes a robust three stage approach to assessing reasonable alternatives to housing delivery. In the first instance the SA assessed the LPA's approach to formulating the 'Overall Pattern of Development' (e.g. the Spatial Strategy). Secondly, the SA assesses nine options which articulate the preferred spatial strategy in terms of housing numbers and strategic locations. Thirdly the SA assesses strategic sites put forward to deliver the housing quantum in accordance with the broad spatial strategy.

Overall Pattern of Development

- 1.5 The Issues and Options Report (2007) identified six broad options for where housing growth should take place within the district, all of which were subject to Sustainability Appraisal. The options for the 'Overall Pattern of Development' were:
- A – within existing towns and villages;
 - B – brownfield or previously developed land
 - C – extensions to the edges of main settlements
 - D – extensions to the edges of villages
 - E – in a new settlement; and
 - F – in settlements along public transport routes
- 1.6 Whilst not explicitly assessing a non-Green Belt/AONB option through the SA process, the very nature of option A, represents an assessment of non-Green Belt /AONB option.

- 1.7 The initial options A-F were followed by the development of three further options known as '*Refined Options*', all of which were subject to Sustainability Appraisal. They were:

A – Urban Focus (Greater growth across the larger villages alongside urban extensions)

B - Urban Concentration (Concentrates the vast majority of growth toward the urban areas)

C – Building on our strengths (This option recognises that whilst the urban areas will still take the bulk of housing growth, the rural areas will also have significant but proportionate housing and economic growth).

- 1.8 In line with the results of the SA findings the LPA's preferred approach is Option C 'Building on our Strengths'. This option will facilitate proportional growth across the District's rural areas and improve the deliverability of the chosen housing target by including a number of development sites in smaller but sustainable settlements.

Housing Delivery

- 1.9 Nine options were developed by the LPA to articulate the 'building on our strengths' spatial strategy in terms of housing numbers and strategic locations. The SA assessed options A-G, which in terms of housing numbers ranged between 13,294 and 20,560 dwellings to be delivered over the plan period. The range of options assessed covered the continuation of the South East Plan figures, the lowest reasonable level, through to the jobs-led 'policy on' scenario. It is considered that there are no other reasonable options that fall outside of this range, when considered against the context provided by the objectives of nationally significant City Deal and the existing housing pressures within the district.

Housing Delivery Options

Housing Delivery Options								
Option	Local Plan Part 1						Sub-total planned housing for Local Plan Part 1	Total over plan period
	Wantage /Grove	Faringdon	Harwell campus	Didcot	Ab'don/ Botley	Larger Villages		
Option Ai	1,500	350	400	2,150			4,400	13,294
Option Aii	1,950	350	400	2,150			4,850	13,294
Option Aiii	2,250	350	400	2,150			5,150	13,294
Option B	2,650	750	400	2,350	3,790		9,940	19,688
Option C	2,250	350	400	2,150			5,150	14,308
Option D	1,950 + 200 ECH	350 + 100 ECH	400 + 100 ECH	2,150 + 100 ECH	200 ECH		4,850 + 700 ECH	13,294 + 2,300 ECH
Option E	2,250 + 200 ECH	350 + 100 ECH	400 + 100 ECH	2,150 + 100 ECH	200 ECH		5,150 + 700 ECH	14,308 + 2,300 ECH
Option F	2,650	750	400	2,350	0		6,150	15,898
Option G	4,750	950	1,400	3,350	1,000	2,510	13,960	20,560

N.B. ECH stands for 'Extra Care Housing'.

- 1.10 Option G which sets a requirement of 20,560 dwellings, which is informed by the 2014 SHMA, was selected by the Council as it meets (in full) the district's apportionment of the Oxfordshire Housing Market Area's objectively assessed housing need. Option G relies on the delivery of all strategic sites (Wantage/Grove, Faringdon, Harwell Campus, Didcot, Abingdon/Boley) and sites at 'Larger Villages' within the district, all of which were subject to Sustainability Appraisal. The SA Report highlights that a clear set of trade-offs in regard to environmental issues are likely to be required to deliver Option G and secure its significant positive effects in respect of achieving socio-economic objectives,

"Option G was appraised to lead to the most beneficial socio-economic effects; but there were potential significant 'environmental' effects that could potentially be overcome with detailed design and development management policies."

Selection of Strategic Sites

- 1.11 In formulating the spatial strategy for the Local Plan, the LPA determined that the allocation of strategic sites was required. Accordingly the SA assessed potential strategic sites at three different stages, as and when housing targets were

updated and when new potential sites were identified through the plan-making process.

- 1.12 In identifying preferred sites, the LPA first considered those sites which were not located within the ANOB or the Green Belt. However, due to the scale of the housing requirement the LPA took the decision to consider sites within the AONB and the Green Belt. Accordingly a robust Green Belt Review was commissioned by the LPA, the results of which informed the SA process and the final site selection process. The Green Belt Review confirms that,

"The Oxford Green Belt has remained predominantly intact since it was approved in 1975. As set out in the NPPF, production of the new Local Plan 2031 Part 1 is the appropriate time to consider whether exceptional circumstances have arisen that warrant alterations to the general extent of the Green Belt."

- 1.13 Indeed the need to review the Green Belt as part of the plan preparation process is outlined at paragraph 12.3.13 of the Sustainability Appraisal,

"A mix of sites are required that would deliver homes in the short as well as longer term to restore and maintain a five year housing land supply. Therefore in order to achieve this it has been necessary to consider sites in AONB and Green Belt."

- 1.14 Following the completion of the Green Belt Review and in light of the SA Report and the chosen Housing Delivery Option (Option G) the Council took the decision to identify land for development where it no longer met the five Green Belt purposes as outlined at Paragraph 80 of the NPPF. Whilst identifying sites for release, the SA and Green Belt Review process also led to sites such as 'North Radley' being discounted from SA preferred site package due to *"inconsistency with landscape Green Belt advice (harmful to Green Belt and landscape character)."* It is considered that the discounting of sites such as North Radley acts as a clear indication as to the robustness of the methodology employed in the SA and Green Belt Review process.

- 1.15 Over the course of the plan-making process a total of 54 alternative sites were subject to SA. It is important to note that despite sites being identified at different stages of the plan-making process, all sites were appraised using a common methodology, as outlined at Appendix 2 of the SA Report. The final strategic sites package taken forward in the publication Local Plan comprised of

22 sites, both Green Belt and non-Green Belt, located across three strategic sub areas, which totalled 13,960 dwellings.

- 1.16 Ultimately, the Local Plan is shaped by the requirement to meet objectively assessed housing needs, which responds to the aims and objectives of the City Deal, and robust evidence that can be tested. Small and focused Green Belt review, in combination with delivering other non-Green Belt sites will make a material contribution to meeting objectively assessed housing need and accommodating economic growth. Any review of existing Green Belt boundaries cannot be considered in isolation but must be undertaken in the plan-making process, alongside economic and social considerations, as has been the case here. The policy advocated in the Local Plan still protects those areas making a meaningful contribution to the achievement of Green Belt purposes. Redrow agrees with paragraph 5.42 of Local Plan which states,

"Some of the sites identified as strategic allocations within this plan have been historically located within the Oxford Green Belt..... The sites all fall within land that has been identified through the local Green Belt Review to no longer meet the purposes of the Green Belt".

- 1.17 Redrow Homes consider that at the initial 'Overall Pattern of Development' stage the SA Report assessed a non Green Belt / ANOB option (e.g. Option A within existing towns and villages) and a range of other reasonable options. The SA then robustly assesses nine different housing delivery options and associated strategic sites. If the Local Plan is to provide a positive framework to enable the objectively assessed need to be met in full, supporting strategic economic policy for the Oxford area, the SA points out that the judgements must be made, reflecting paragraph 8 of the NPPF which states that *"to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system"*. Accordingly, the sites selection process which supports the delivery of the housing 2014 SHMA need requirement has been underpinned by a robust and appropriate SA and Green Belt Review process.

- 1.18 Redrow Homes consider that the Council's approach is consistent with the requirements of paragraph 10 of the NPPF which outlines the need for Plans *'to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas'*. The

Spatial Strategy outlined in the Local Plan is considered to be a sound, positive and proactive approach to meeting the Council's full objectively assessed need, meeting the requirements of Paragraph 47 and 182 of the NPPF. The City Deal responds to the Government's commitment to securing economic growth set out at paragraph 18-20 of the NPPF and a local review of existing local Green Belt boundaries should be seen in this context, providing the basis for the identification of exceptional circumstances referred to at paragraph 83 of the NPPF.

- 1.19 The proposed housing target of 20,560 and the proposed site allocations are fully compliant with the spatial strategy '*building on our strengths*' as evaluated in the Sustainability Appraisal process, and will deliver the required housing and economic growth, which is of national importance. Oxford is world renowned for academic excellence and historical significance, the City Deal states,

'Oxford is a global brand, known the world over for its academic excellence and historical significance. The area is amongst the top five Technology Innovation Ecosystems in the world, home to an impressive knowledge-intensive cluster, with 1,500 high tech firms employing around 43,000 people.'

- 1.20 However, The City Deal, agreed by the Government, outlines that despite Oxfordshire's wealth of world-class assets it has underperformed. The Oxfordshire Innovation Report (2013) indicates that if Oxford had grown at the same rate as Cambridge between 1997-2011, £500m more GVA would have been created in the local economy. A key aspect boosting the performance of Oxfordshire and increasing economic investment in the area is delivering new housing development. Indeed, the Oxfordshire and Oxford City Deal report states that currently the demand for housing and business premises outstrips supply, which has led to a shortage of available property, pricing many employees and businesses out of the market. The three sub-areas identified to deliver the necessary and sustainable growth (Abingdon-on-Thames and Oxford Fringe, South East Vale and Western Vale) will enable the Council to meet, in full, its objectively assessed housing need, supporting the forecast growth in employment opportunities.

- 1.21 Redrow Homes consider that there is a set of exceptional circumstances which clearly justifies the principle of Green Belt release. The Green Belt review has addressed the next logical question, which is the identification of particular

suitable sites for release from the Green Belt bearing in mind the level of housing which cannot be accommodated in non-Green Belt land. The Council's approach to release appropriate sites from the Green Belt, is supported by:

- The immediate need to deliver housing growth in order to support the aims and objectives of the Oxford and Oxfordshire City Deal, as agreed by Central Government in January 2014;
- The need to deliver economic growth in Oxfordshire, which is of national importance. In particular, the City Deal will:
 - 1) *Invest in a network of innovation and incubation centres which will nurture small businesses;*
 - 2) *Accelerate the delivery of 7,500 homes across the county;*
 - 3) *Enable the delivery of three new transport schemes at the Enterprise Zone, Northern Gateway and the first phase of the 'Science Transit';*
 - 4) *Deliver 500 new apprenticeships for young people;*
 - 5) *Provide £95m of local and national public sector investment with a further £550m of investment from housing providers;*
 - 6) *Deliver nearly £600m of private sector investment; and*
 - 7) *Create 18,600 new jobs and a further 31,400 jobs during the construction phase.*
- The requirement for the planning system to deliver all three dimensions of sustainable development (Paragraph 7 of the NPPF);
- The need for Plans and decisions to take into account local circumstances in order to achieve sustainable development (Paragraph 10 of the NPPF);
- The need for the planning system to be genuinely plan led (Paragraph 17 of the NPPF);
- The need to ensure that planning proactively drives and supports sustainable economic development to deliver the homes, employment opportunities and thriving local places that the country needs (Section 39

of the Planning and Compulsory Purchase Act 2004 and paragraphs 14, 17 and 84 of the NPPF); and

- The need for local planning authorities to plan for economic growth in order to develop an economy fit for the 21st century (paragraph 20 of the NPPF).

1.22 The appropriate process has been followed through the preparation of the Green Belt Review Final Report and Sustainability Appraisal. It is considered that the Sustainability Appraisal successfully tests the Local Plan against a range of reasonable alternatives in terms of the overall requirement for land for housing and its broad spatial distribution. Paragraph 83 of the NPPF readily acknowledges that the plan making process can incorporate the review of existing Green Belt boundaries in exceptional circumstances. Redrow Homes believes that the matters set out above represent exceptional circumstances and warrant a review in the district. The review which has been carried out is robust and sound.

Question 1.3 - Is it appropriate for the plan to include only Strategic Policies and Site Allocations and for detailed planning policies and non-site strategic site allocations to be devolved to a Part 2 Local Plan document? Is there a clear justification for this and does it accord with national policy?

- 1.23 At paragraph 153 the NPPF outlines that Local Plans are required to be sufficiently flexible to deal with changing circumstances. The identification of non-strategic site allocations in a Local Plan Part 2 will provide certainty on the delivery of growth identified outside urban areas and greater flexibility on meeting growth needs across the entire District.
- 1.24 It is acknowledged that the NPPF advocates the production of a single Local Plan, however, the NPPF does not actively discourage the two stage approach and indeed there is no legal requirement for a single Local Plan approach. The key legal requirement is for the production of Local Plans is to accord with a Council's Local Development Scheme (LDS). VoWH District Council has an up to date LDS in place which outlines the timetable for the production of the Local Plan Part 2. At the Part 1 stage, strategic issues such as exceptional circumstances have been adequately assessed, leaving further detail to be considered in the Local Plan Part 2, in the context of a robust strategy.
- 1.25 The growth identified through the Local Plan Part 2 will be robustly guided in by the Spatial Strategy established in the Local Plan Part 1. The Council's approach to provide the broad location of development and strategic allocations in a Local Plan Part 1 is a common and sound approach. Indeed, the Cherwell Local Plan which is also underpinned by the 2014 Oxfordshire SHMA and was recently found sound, subject to modifications, adopts a similar approach in that the Council will also produce a Part 2 Local Plan to identify non-strategic allocations and detailed development management policies.
- 1.26 The identification of non-strategic sites in Local Plan Part 2, will ensure the Spatial Strategy within the Local Plan Part 1 meets its objectives across the district in a way which maintains or enhances the local identity of the district's settlements and the functions they perform, whilst maintaining a robust supply of housing land. The Council's commitment to developing a Part 2 Local Plan is illustrated by the Local Development Scheme (LDS) which accompanies the submission Local Plan. The timetable indicated in the up to date LDS (2015-2018) identifies that the Part 2 Local Plan will be submitted to the Secretary of State for examination in October 2017, with an estimated adoption date of June 2018. The positive and

proactive approach adopted by the Council, in respect of working to ambitious but realistic timescales, outlines their commitment to delivering the required level of housing need in the district to support the overarching goal of delivering economic growth which is of national significance.

- 1.27 All of the Oxfordshire authorities have firmly committed to addressing the full housing need arising from the 2014 SHMA, through the Oxfordshire Statement of Co-operation. Redrow Homes consider that the planning policy mechanisms outlined in Core Policy 2, in terms of potentially undertaking a Local Plan review or producing a Site Allocation style document to address unmet need, are a sound and an appropriate way for all Oxfordshire authorities to proceed at this time. There is a clear synergy and common approach in place between the Oxfordshire authorities, at a county wide level, which has recently been found sound by the Inspector undertaking the examination of the Cherwell Local Plan.
- 1.28 Indeed, this two stage approach assists with the Government's wider objective of ensuring up to date Local Plans are delivered as soon as possible. Although dealing with the separate topic of early review, the desirability of early and proportionate plan coverage in principle was reiterated in a July 2015 Written Ministerial Statement from the Minister of State for Planning and Housing (Brandon Lewis),

"As we have made clear in planning guidance a commitment to an early review of a Local Plan may be appropriate as a way of ensuring that a Local Plan is not unnecessarily delayed by seeking to resolve matters which are not critical to the plan's soundness or legal competence as a whole".