

Vale of White Horse Local Plan 2031 (Part 1 Strategic Sites and Policies) Examination - Stage 2



Hearing Statement on Behalf of Redrow Homes South
Midlands Respondent 723103 - Matter 13

5 January 2016

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Matter 13 – Viability, Delivery, Monitoring and Contingency (CP47 and Monitoring Framework)

- 1.1 This Statement responds to the Stage 2 Matters and Questions as at 17 December 2015.
- 1.2 This Statement specifically deals with aspects relevant to Strategic Site 5 East Sutton Courtenay.
- 1.3 Bidwells on behalf of Redrow Homes South Midlands made representations to the Publication Stage of the Local Plan in December 2014 and are participant at relevant Stage 2 Examination Hearings.
- 1.4 A Statement of Common Ground between Vale of White Horse District Council (the Council) and Redrow Homes South Midlands in respect of Site 5 was submitted in respect of Stage 1 of the Examination Hearings.
- 1.5 The Statement of Common Ground was signed by the Council dated 10 September 2015.
- 1.6 An outline planning application for up to 200 dwellings and associated development on part of the Site (reference: P15/V2353/O) was registered by the Council on 5 October 2015. This application remains under consideration by the Council.
- 1.7 It is acknowledged that Stage 2 of the Examination Hearings is not intended to examine the current planning application for part of the Site. However there are technical matters assessed through the current planning application which are relevant to the examination of the Local Plan during the Stage 2 hearings.



- 1.8 13.1 Having regard to NPPF paragraph 174, has the likely cumulative impact of the plan's policies and standards, together with other local and nationally required standards, been adequately considered using appropriate available evidence? Is there evidence that the plan's policies and standards would not put implementation of the plan at serious risk and would facilitate development throughout the economic cycle?**
- 1.9 It is considered the infrastructure requirements set out within the Local Plan would not put implementation at risk.
- 1.10 Paragraph 174 requires Local Standards should be set out within the Local Plan, including requirements for affordable housing. The Local Plan clearly sets out the infrastructure requirements to meet the planned housing requirements, through reference to the Infrastructure Delivery Plan, which underpins the emerging Community Infrastructure Levy (CiL) rates. We have requested changes to Policy 24: Affordable Housing under Matter 12.
- 1.11 Redrow Homes South Midlands working with the District Council and Oxfordshire County Council have progressed the aforementioned planning application. This is considered to be deliverable and sustainable development.
- 1.12 13.2 Do policy CP47 and Appendix G (The Monitoring Framework) provide a sound basis for monitoring implementation of the Core Strategy and for taking appropriate action if implementation is not on track?**
- 1.13 The monitoring framework does not currently provide a sound basis for taking appropriate action as it is currently ineffective, particularly in respect of housing delivery to maintain a rolling 5-year supply of land and triggering the mechanisms set out within Policy CP47 for a full or partial review of the plan.
- 1.14 Policy CP47 sets out that should allocated development sites (including those within Neighbourhood Plans) not be brought forward the council will consider:
- i. seeking alternative sources of funding if a lack of infrastructure is delaying development, to bring delivery back on track
 - ii. investigate mechanisms to accelerate delivery on other permitted or allocated sites
 - iii. identifying alternative deliverable site(s) that are in general accordance with the Spatial Strategy of this plan, through the Local Plan 2031 Part 2 or another appropriate mechanism; and if required
 - iv. through a full or partial review of the Local Plan 2031.



- 1.15 As noted in our response to Matter 11, the Council is unable to demonstrate a robust five year supply of sites at the current time, when taking into account the historic shortfall; the requirement can only be met through the application of the Liverpool Methodology.
- 1.16 Our original representations highlighted that, whilst there is a clear rationale in the Housing Topic Paper (TOP04), the plan does not contain an adequate justification for the Liverpool Methodology. As such, aspects of the plan relating to housing supply and location are likely be considered out-of-date. The absence within the plan leads to uncertainty and leaves the district open to challenge particularly from a development management perspective. Without explicit text within the plan, it is considered that the district and plan (which by virtue of paragraph 49 will be out of date) is open to challenge which could threaten the overall strategy.
- 1.17 The Monitoring Framework is vital to the overall effectiveness of the Local Plan. Given the significant challenges presented by the volume of the housing need and shortfall (with 20% buffer), it is important that the monitoring framework is able to distinguish between meeting the OAN and addressing historic shortfall for any future plan review or as a result of future development required to meet the needs associated with the City of Oxford, which are addressed in the proposed modifications to Core Policy 2 (Schedule of Changes B).
- 1.18 Furthermore, despite the importance of the allocations, as presently drafted the plan contains no clear dates for expected delivery to trigger the mechanisms within Policy 47. It is suggested that Appendix G should contain an indicative trajectory for delivery of the allocations to provide additional clarity, monitoring targets to complement the revised policies within the plan and to assist in providing a clear timescale for implementing Policy 47.
- 1.19 In addition to the delivery of allocated sites, the monitoring framework is fundamental to ensuring the success of the housing 'ring fence' for the Science Vale to ensure that homes are delivered with employment opportunities. Site 5 East Sutton Courtenay is one of the sites that help to meet this need. The monitoring framework does not, in our view, reflect the importance of this strategy nor provide the necessary mechanisms by which to review the effectiveness of the plan. At present, there is a concern that should there be an under delivery across the district as a whole the 'ring fence' may be considered to be out of date leaving the district vulnerable to speculative applications that could undermine the delivery of the strategic allocations.
- 1.20 Conclusion**
- 1.21 We request that Appendix G contains an indicative trajectory for delivery of the allocations to provide additional clarity, monitoring targets to complement the revised policies within the plan and to assist in providing a clear timescale for implementing Policy 47.



1.22 We request a change to the monitoring framework which does not, in our view, reflect the importance of this strategy nor provide the necessary mechanisms by which to review the effectiveness of the plan.

1.23 **Word Count: 1,080.**

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