



Gladman Developments Ltd

Vale of White Horse Local Plan Part 1 Examination

Stage 2 Hearings

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

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. Appendix G of the submitted Local Plan lists a number of Saved Local Plan 2011 Policies that are proposed to remain in place until they are reviewed as part of the Local Plan 2031 Part 2. It is proposed that Policies NE7 The North Vale Corallian Ridge and NE9 The Lowland Vale are two such policies, inter alia, that should remain in place.
2. Both policies seek to prevent development that would have an adverse impact on the landscape character of these areas which cover a large part of the western part of the area. However such broad restrictive policy designations, which seek to protect the entirety of these areas rather than valued locations within them, are contrary to NPPF which states in paragraph 113 that:

"Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and

locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks."

3. Paragraph 115 of NPPF makes it clear that the highest degree of protection should be given to the landscapes of National Parks and Areas of Outstanding Natural Beauty.
4. Gladman considers that the retention of Policies NE7 and NE9 will unreasonably prevent in sustainable development and will act against the objective in NPPF of significantly boosting housing delivery. Contrary to NPPF these policies, if retained, will give an unjustified priority to landscape impact in comparison to the economic and social benefits of development proposals in these areas.

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?

5. Core Policy 47 relates to delivery of development sites and possible contingencies should land not be brought forward in a timely fashion. The policy should be amended to reflect Paragraph 47 of the NPPF which seeks to ensure that a commitment exists to the deliverability of a 5 year supply of housing, and the maintainance of a further supply of developable sites for at least 6-10 years (and possibly 10-15 years). The production of a Local Plan Part 2 and/or a review of the Local Plan would not be able to be undertaken in sufficiently short a time period to be an effective response to a situation where a five year supply of housing land can no longer be identified. This reinforces the need for the Local Plan to contain a Policy which allows for sustainable sites for housing development to be brought forward in the event that a five year supply of deliverable housing sites cannot be identified.
6. Core Policy 47 fails to make reference to the likely need for the district to accommodate some of the unmet housing need of Oxford City. The Oxford Growth Board has now agreed a working assumption that 15,000 dwellings will need to be accommodated in the Oxfordshire Districts. The latest timetable for the Growth Board is for the distribution of these dwellings to be agreed in July 2016, although some of the underlying evidence is likely to be available in April 2016.
7. It is likely that an apportionment of some of Oxford's unmet need will be made to the Vale of White Horse district with a resultant increase in the housing need for the District which

would have to be taken into account in determining the 5 year housing land supply. There is a possibility that the Local Plan could be adopted prior to the apportionment being agreed. Equally it might be adopted after the Growth Board decision but without reference to the apportionment. In either case the Plan would immediately be out of date. Consequently, the Plan could be delayed to allow for the process of assessing new housing sites to meet total need arising and undertaking public consultation thereon.

8. Alternatively Gladman considers that it is feasible for a sound Local Plan to be achieved by means of modifications which provide sufficient flexibility in the Plan to deal with the distribution of Oxford's unmet housing needs once agreed. Such modifications would firstly involve the allocation of additional housing sites (including sites of less than 200 dwellings) and secondly would provide for a new policy which would allow for planning permission to be granted for sustainable and immediately available unallocated sites on the periphery of the market towns, local service centres and larger villages. It is suggested that this policy would come into play when the housing delivery falls below 80% of the housing requirement for the district.
9. This approach would serve to address not only the issue of Oxford's unmet housing need but also Gladman's serious concerns regarding the ability of the Plan as it stands to deliver a continuous 5 year supply of housing land throughout the Plan Period and the need for additional housing allocations to tackle this deficiency.