



**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr
First Name	Matthew
Last Name	Stock
Job Title (where relevant)	
Organisation (where relevant)	Redrow Homes (South Midlands)
Address Line 1	
Line 2	
Line 3	
Line 4	
Post Code	
Telephone Number	
E-mail Address (where relevant)	

2. Agent's Details (if applicable)

Mr
David
Bainbridge
Partner
Bidwells
John Ormond House
899 Silbury Boulevard
Central Milton Keynes
MK9 3XJ
01908 514 612
David.bainbridge@bidwells.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

X

No

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- 1.1 Core Policy 2 identifies the approach to addressing Oxford City's unmet need.
- 1.2 There is clear evidence of cooperation between the districts in terms of the evidence base (SHMAA) and on-going negotiation, as set out in Topic Paper 1. This paper details on-going engagement with neighbouring authorities to address a variety of strategic matters, including housing and infrastructure matters between the City and the VoWH.
- 1.3 The Strategic Housing Market Assessment (SHMA) highlights that Oxford is unlikely to meet its full needs and some housing may be required in neighbouring authorities, such as the VoWH. However, it is noted that the extent to which housing can be delivered within the City is still being agreed and assessed.
- 1.4 Rather than delay progress with the Local Plan, the approach being advocated by the VoWH through Policy 2 is to meet its own needs through an up-to-date Local Plan, with provision made for a focused review or additional allocations adjacent to the City. This approach provides sufficient flexibility to meet Oxford's future needs, whilst ensuring that the VoWH have an up-to-date Local Plan in place. We would seek to highlight that paragraph 12 of the NPPF highlights that *it is highly desirable that local planning authorities should have an up-to-date plan in place.*
- 1.5 Based on the information within Topic Paper 1, the Local Plan meets the duty to cooperate with neighbouring authorities and infrastructure agencies on strategic matters.
- 1.6 The VoWH Local Plan provides the certainty required to bring forward development on sites such as Land East of Sutton Courtenay in a timely manner, as well as providing the district with a strong policy basis upon which to determine a planning application.
- 1.7 The policy proposed is effective in meeting local needs, justified based on local circumstances, and positively prepared by allowing development to come forward in a co-ordinated manner.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to participate to ensure a balanced debate in respect of housing distribution across the area, in particular the approach being taken toward meeting additional need that could arise in future, once Oxford City have prepared and published their site selection evidence

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph

3.1/3.2

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

X

No

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Redrow Homes support the Local Plan's Spatial Vision and, in particular Strategic Objectives 1, 2, 5 and 6.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to participate to support the strategy and objectives set out within the Plan to meet the housing needs for the Vale of White Horse.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

3

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- 1.1 The identification of Sutton Courtenay as a Larger Village, and the allocation of 220 homes to contribute to the wider local need is welcomed and supported. The identification of the village is based on the Town and Villages Facilities Study, as updated in February 2014. This study shows the village has a score of 21, making it one of the most sustainable Larger Villages within the district.
- 1.2 Redrow note that the Spatial Strategy is based on three sub-areas. Each sub area has specific requirements in relation to housing, employment and infrastructure. The sub-areas are based on a wide evidence base which includes the Strategic Housing Market Assessment and the Character Assessment for the area. The use of the sub-areas to set specific requirements and deliver the vision for the plan is supported and is considered to be a justified and effective response to the issues faced within the district.
- 1.3 Redrow note that the Village of Sutton Courtenay is located midway between the settlements of Didcot and Abingdon-on-Thames. As such, the village has a functional relationship with both settlements. However, due to the construct of the plan and the relevance of the sub-areas and supporting evidence base to later plan policies such as housing mix and affordable housing, it is necessary for the village to be 'grouped' correctly.
- 1.4 The mapping shows that the village falls within South East Vale Sub-Area, whilst Policy 3 identifies the village as falling within the Abingdon-on-Thames and Oxford Fringe Sub- Area; this matter needs to be rectified to ensure consistency and clarity throughout the plan. We have reviewed the Topic Papers and cannot find evidence to provide clarity on the correct geographical location. However, based on the information set out within the Strategic Housing Market Assessment, we believe that the village is best located within the South East Vale Sub-Area.
- 1.5 For the avoidance of doubt, we support the inclusion of Sutton Courtenay in the South-East Vale sub-area, due to its wider rural setting and characteristics, its geographical location and the evidence provided within the Landscape Character Assessment.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to ensure that the plan is Justified and Effective, and thus sound, the location of Sutton Courtenay must be consistent throughout the plan.

We would welcome clarification as to the location of Sutton Courtenay within sub-areas and minor modifications to ensure consistency throughout the plan in recognition of the contribution that Land East of Sutton Courtenay will make to meet the overall housing needs of the sub-area.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to appear to ensure that the matters above relating to policy 3 and the location/role of the village is properly debated in respect of its contribution to wider housing needs of the VoWH.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph

Table 4.1

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

X

No

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- 1.1 We support the distribution of growth as set out within the spatial strategy for the Vale of White Horse, which includes allocations in the market towns and the larger villages, such as Sutton Courtenay.
- 1.2 In our view, the plan provides a robust justification for its approach, which responds and balances the unique characteristics of the district covering the economic opportunities presented by the Science Vale, Oxford, Swindon and Didcot and the environmental characteristics of the district, which are implicit in the overall distribution of housing. As such, the plan identifies three key planning areas, and seeks to allocate strategic sites within these areas across a range of settlement types to deliver sustainable development.
- 1.3 It is acknowledged that the strategic allocations do not identify all growth required in the district between 2011 and 2031. The Plan sets out that the strategic allocations will be complimented by additional development to be brought forward through the Local Plan Part II and Neighbourhood Plans. This is considered a proportionate and appropriate way to identify smaller sites within rural villages and ensure that the plan is flexible in its ability to respond to local needs, as per Paragraph 54 of the NPPF.
- 1.4 Overall, in our view the strategy is in conformity with the requirements of the NPPF, in particular paragraph 55, which encourages development in the rural area to be located where it can enhance and maintain the vitality of rural communities
- 1.5 The Strategy makes provision for a significant increase in the levels of housing being delivered across the district, over and above the previous plan targets derived from the South East Regional Plan. This provision is based on the Objectively Assessed Needs of the district from the Strategic Housing Market Assessment and will lead to a 'significant boost' to housing delivery, in accordance with the requirements of paragraph 47 of the NPPF.
- 1.6 In conclusion, the spatial strategy will contribute towards meeting the housing needs of the district and fulfilling the vision and objectives of the plan.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to appear to ensure that we can contribute to the debate in respect of the overall spatial strategy, as set out in the plan, and comment on how future additional needs may be met.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

4

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

X

No

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- 1.1 Redrow Homes (South Midlands) support the target of 20,560 (Option G) and consider that this requirement represents the objectively assessed needs for the VoWH. This figure is based on the most up-to-date evidence, the Oxfordshire SHMA, which takes into account the requirements of the Planning Practice Guidance to address demographic factors, employment trends, market signals and the affordability of housing. This approach is consistent with that now being favoured by Cherwell District Council through their examination process and seeks to meet the concerns raised in that district by the Examiner. The approach and justification is set out within the supporting Housing Topic Paper (3).
- 1.2 It is noted that, in addition to the VoWH's Objectively Assessed Need, there is likely to be unmet need from Oxford (as set out within the SHMA and at Core Policy 2). Redrow Homes (South Midlands) support the pragmatic approach being proposed by the VoWH in addressing unmet need from Oxford and agree that, at this time it is not appropriate to delay the implementation of this plan to deliver housing in the Vale, whilst Oxford undertakes its plan review.
- 1.3 Redrow Homes South Midlands support the designation of Sutton Courtenay as a 'larger village' and the supporting text, which identifies Land East of Sutton Courtenay as an allocation for 220 homes to meet the housing needs in the South East Vale sub-area. It is noted that this area, due to the inclusion of the Science Vale, will take the largest share of all growth within the District. Redrow Homes South Midlands consider that the 'ring-fence' housing supply within the South East Vale Sub-Area could be signposted from the policy to add a greater degree of clarity in respect of the role of Larger Villages, Market Towns and other allocations.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The inclusion of a signpost to the 'Ring Fence' within the South East Vale Sub-Area would be helpful in understanding the significant amount of growth planned for this area.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to participate to ensure that the role of Sutton Courtenay and the contribution that land East of Sutton Courtenay will make to the wider housing needs of the South East Vale sub-area can be explored. As noted in supporting representations, this site is inconsistently identified throughout the plan and thus it is important to ensure that it is being considered in a transparent and open forum.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

A black rectangular box redacting the signature.

Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

15

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- 1.1 Redrow homes observe that figure 5.4 omits the Land at Sutton Courtenay and the list of Larger Villages within Policy 5 does not identify Sutton Courtenay.
- 1.2 However, we have assumed that the village falls within the South Eastern Vale on the basis of the table which sets out the constituent allocations within the South East Vale Sub-Area. The comments of Redrow Homes (South Midlands) are based on the presumption that the village contributes to housing at this location.
- 1.3 Redrow Homes (South Midlands) support the delivery of 12,450 homes in this area and the ring fence of 11,850 for the areas identified to meet the needs within the Science Vale. Redrow Homes South Midlands believe that this approach will help to ensure that the majority of homes are delivered in the most sustainable locations close to major employment centres and the objective to align housing growth with jobs and economic opportunities. Furthermore, the approach set out within the policy will seek to protect villages from additional unallocated development.
- 1.4 Redrow Homes (South Midlands) consider that the allocation can be delivered within the context of Appendix A, subject to minor modifications to provide additional clarity (as set out in our response to Appendix A), and note the content of Policy 15 which requires a master planning process to involve the community, local planning authority and other Stakeholders.
- 1.5 The Land East of Sutton Courtenay is considered to be deliverable and is not overly reliant on the provision of major infrastructure. On-going technical work to support an allocation is presently being prepared, including a framework plan. Smaller allocated sites, such as East of Sutton Courtenay, will make a significant contribution to meeting the housing needs in the shorter term and delivering the Plan's vision.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy 15 must be subject to modifications to ensure that the village of Sutton Courtenay is explicitly identified consistently throughout the plan. Redrow Homes South Midlands believe that this should be the South East Vale sub-area, where the site meets a specific housing need outside of the Science Vale 'ring fence'.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to participate in this matter to ensure that the role of Sutton Courtenay and its location within the sub-area are discussed in the context of the wider ring-fence and other sub-vale specific requirements.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

A black rectangular box redacting the signature.

Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

22

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

X

No

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

We support the approach included within Policy 22 and believe that it is sufficiently flexible to respond to changes in circumstances over time. The use of the SHMA and other up-to-date evidence will ensure that developments can respond to local circumstances.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We support the current approach, but reserve our right to appear should the policy alter as a result of comments made during this consultation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

24

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

X

No

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The approach to meeting affordable housing needs within the district is supported. We believe that the policy is justified, based on the evidence set out within the SHMA and other sources, positively prepared and will be effective in contribution towards the affordable needs within the VoWH.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We support the current approach, but reserve our right to appear should the policy alter as a result of comments made during this consultation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

47

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- 1.1 It is noted from Housing Topic Paper 3 that between 2011 and 2014 the shortfall of housing against the planned requirement is likely to be in the region of 1,096 homes. Redrow Homes South Midlands (RHSM) believe that it is undesirable for the plan not to set out how this shortfall will be met, as it may leave the district open to future challenges, as policies relating to the supply of housing will become out-of-date should a five-year supply not be demonstrable.
- 1.2 It is noted that Topic Paper 3 and the Sustainability Appraisal contain a range of evidence in respect of how shortfall will be met. This includes the use of the 'Liverpool' approach to spread the housing shortfall and the trajectory which sets out when the large allocations will deliver. Whilst RHSM are supportive of the Liverpool approach or a variation which uses delivery evidence in the specific circumstances of the Vale of White Horse, it is noted that in the development management context the 'Sedgefield' approach is generally considered to most closely align to Policy 47 of the National Planning Policy Framework. As such, RHSM believe that the evidence provided in Housing Topic Paper 3 to justify the Liverpool approach could usefully be incorporated into the monitoring framework and supporting text to (Local Plan) Policy 47 to ensure clarity and assist in future planning decisions.
- 1.3 At present, despite support for the plan, the application of how shortfall will be met is not adequately justified within the text of the plan; as such the plan is not presently effective in this regard.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We would support the inclusion of supporting text which sets out clearly how accrued shortfall will be addressed over the plan period and the methodology that will be applied in assessing the Housing Land Supply in order to provide greater certainty and clarity.

We would support the inclusion of a summary 'trajectory' for the larger sites within the monitoring policy to further ensure that vital evidence contained within the supporting topic papers is reflected in the plan to ensure that the plan is not out-of-date in the shorter term whilst Neighbourhood Plans and the Part II Local Plan are brought forward.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒


Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to appear to ensure that issues of previous shortfall is discussed in pragmatic manner, and ensure that steps to address any accrued shortfall are reflected within changes to the plan thus ensuring that the plan is effective in the shorter-term and will not be out-of-date by virtue of land supply.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- 1.1 Whilst Redrow Homes South Midlands do not object to the overall framework set out within Appendix 4, the use of the term 'urban extension' within this section of the plan may be unhelpful. Due to the location and nature of the village, the development in isolation is unlikely to provide the full range of services required to deliver an urban extension. The term 'village' extension is likely to be more appropriate in this case.
- 1.2 It is noted that the appendix identifies contributions towards strategic Infrastructure Improvements in Abington on Thames. We note that there is additional development allocated around Abington-on-Thames which will also have an impact on the strategic infrastructure in the town. This may mean that monies will need to be 'pooled'. Where such measures are not directly related to the delivery of the development, improvements should be identified and funded through the Community Infrastructure Levy. As such, we do not believe that this approach is justified when assessed against the CiL draft charging schedule.
- 1.3 We note that education uses are also covered by the CiL proposed charging schedule. Whilst we have no objections toward education contributions, we would highlight that provision is made within the CiL charging schedule for similar contributions. Therefore, there needs to be a degree of clarity within the appendix in respect of the source of funding to support education infrastructure.
- 1.4 This said, Redrow Homes South Midlands are confident that they are able to deliver the required infrastructure and obligations to support development in the village.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant

or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Whilst not a specific policy, the appendix sets out the principle considerations for the allocation of Land East of Sutton Courtenay.

The text should be amended to read

"high quality and sustainable ~~urban~~ Village extension to Sutton Courtenay which is integrated with Sutton Courtenay so residents can access existing facilities in the village."

This is considered to be more positive and in keeping with the principles of the plan and development at this location.

In relation to infrastructure, the text should identify the source of funding for the infrastructure to ensure that it is consistent with the Draft CiL charging schedule. Whilst the CiL has yet to be adopted, there is a need to ensure that infrastructure is not being 'pooled'. Clarification on this matter via minor modification will ensure that the plan is justified.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to appear to ensure that matters relating to the Appendix can be discussed in detail to ensure that the plan provides a robust framework from which to deliver the allocation.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

18/12/2014

Part B – Please use a separate sheet for each representation

Name or Organisation : Bidwells on behalf of Redrow Homes South Midlands

3. To which part of the Local Plan does this representation relate?

Paragraph	<div style="border: 1px solid black; padding: 2px;">Sustainability Appraisal</div>	Policy	<div style="border: 1px solid black; padding: 2px;">N/A</div>	Proposals Map	<div style="border: 1px solid black; width: 150px; height: 30px;"></div>
-----------	--	--------	---	---------------	--

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div style="border: 1px solid black; padding: 2px;">N/A</div>	No	<div style="border: 1px solid black; width: 80px; height: 50px;"></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div style="border: 1px solid black; padding: 2px;">N/A</div>	No	<div style="border: 1px solid black; width: 80px; height: 50px;"></div>
4 (3) Complies with the Duty to co-operate	Yes	<div style="border: 1px solid black; padding: 2px;">N/A</div>	No	<div style="border: 1px solid black; width: 80px; height: 30px;"></div>

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

- 1.1 The Local Plan is underpinned by the Sustainability Appraisal Report for the Vale of White Horse Local Plan 2031 Part 1 (October 2014). The Sustainability Appraisal assesses nine housing delivery scenarios ranging from 13,294 to 20,560 dwellings to be delivered over the plan period.
- 1.2 Option G of 20,560 dwellings, was selected by the Council as it meets the district's apportionment of the Oxfordshire Housing Market Area's objectively assessed housing need in full, in accordance with NPPF and the Oxfordshire SHMA (2014). A total of 13,960 dwellings out of the overall Local Plan requirement will be delivered through 22 strategic site allocations. The sustainability credentials of each of the proposed allocations have been tested through the Sustainability Appraisal process.
- 1.3 We note at paragraph 5.13 of Housing Topic Paper 4, the Sedgefield approach is not considered a 'reasonable alternative' for the purposes of the SA. As this approach is most closely aligned to National Policy, as part of a comprehensive approach to the SA, we would welcome an assessment of the Sedgefield approach as part of the strategic alternatives in respect of meeting housing supply.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A short addendum should be provided, based on the existing evidence, to ensure that the SA is robust in respect of assessing the alternatives for meeting past housing shortfall. Whilst we note the reasons set out within Housing Topic Paper 3, the 'Sedgefield' methodology is generally most consistent with National Policy and as such may be considered 'reasonable'. Redrow Homes South Midlands believe it preferable to appraise this option prior to submission to the Secretary of State to ensure consistency in the process.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We wish to appear to ensure that matters raised can be properly debated.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

18/12/2014