

Comment

Agent	Ms Gemma Care (741289)
Email Address	gemma.care@bartonwillmore.co.uk
Company / Organisation	Barton Willmore
Address	Beansheaf Farmhouse Reading RG31 7BW
Consultee	Radley College & Kibswell Homes Radley College & Kibswell Homes (873611)
Address	Unknown Unknown Unknown
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Radley College & Kibswell Homes Radley College & Kibswell Homes
Comment ID	LPPub3699
Response Date	19/12/14 13:11
Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
Status	Submitted
Submission Type	Email
Version	0.4
Files	741289 LPPub.pdf
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	Yes
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? Yes

Q4 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.

2.0 SOUNDNESS OF THE PLAN AND REGULATORY MATTERS

2.1 Updated Housing Requirements for the Vale

2.1.1 These representations to the Publication Draft of the Local Plan (the Plan) follow on from earlier representations submitted by the College in March 2014. Within the earlier representations the College welcomed the uplift in the overall housing target for the Vale as a result of the preliminary findings of an updated evidence base in the form of the Oxfordshire Strategic Housing Market Assessment (SHMA) (February 2014). The SHMA was conducted against the backdrop of the requirements of the NPPF, which instructs local authorities to work with neighbouring councils to prepare a SHMA for the housing market area and to cooperate with them to ensure that the needs of the housing market area are met, unless it is unsustainable to do so.

2.1.2 At the time the February 2014 consultation draft was published, and the corresponding representations submitted, the full SHMA publication was not publicly available, although the Non Technical Summary Report 1 (the Summary Report?) provided a useful overview of the SHMA findings and the implications for the VoWH specifically. The Final Report 2 was published in April 2014 and concludes that up to 93,560 ? 106,560 additional homes are needed across Oxfordshire in the period 2011 ? 2031 (between 4,678 ? 5,328 homes per annum). The SHMA shows that between 24,000 and 32,000 new homes are required during that period in order to meet Oxford City's housing need. Figure 2 of the Summary Report states that the assessed housing need for the Vale of White Horse is 1,028 dwellings per annum (dpa): a single figure is set out for the Vale as opposed to a range, as this is ?a directly aligned committed economic growth scenario and did not require further adjustment in relation to the affordable need scenario unlike other districts within the housing market area. ? Paragraph 3.29 of the Summary Report notes that in relative terms across Oxfordshire the strongest housing demand pressures are in Oxford followed by south of the county, i.e. Vale of White Horse and South Oxfordshire. On this basis, there is a clearly identified need for a significant quantum of new housing development across the VoWH as a whole for the remainder of the Plan period, which should be distributed appropriately across the district in accordance with a robust settlement hierarchy and an appraisal of the most sustainable locations for new housing development.

2.1.3 The identified need for 1,028 new homes per annum over the twenty year period 2011 ? 2031 equates to some 20,560 new homes in the VoWH during the lifetime of the Plan. This is reflected in Core Policy 4 of the Plan (CP4) which also confirms that 13,960 of the total requirement will be delivered through strategic allocations, where development will be supported where they meet the requirements set out within the Development Site Templates at Appendix A to the Plan and in accordance with policies of the Development Plan as a whole. Footnote (a) to policy CP4 makes clear that this target addresses needs arising in the Vale of White Horse and that ?if or when required, needs arising elsewhere in the Housing Market Area, will be addressed by timely and effective cooperative working in accordance with Core Policy 2? [Duty to Cooperate]. CP4 states that the Abingdon-on-Thames and Oxford Fringe Sub Area will accommodate 1,990 new dwellings through strategic allocations of which 510 will be attributed to Radley (240 on the site known as North West of Radley and 270 on the site known as South of Kennington).

2.1.4 The Freeholder wishes to record their support for the approach taken in the Plan in respect of housing need and future growth across the VoWH. In accordance with the requirements of the NPPF and National Planning Policy Guidance (PPG), the Plan is apparently informed by an objective assessment of development needs for housing and economic development in the form of a comprehensive SHMA. It is encouraging to see the Council proactively driving forward a Plan that not only acknowledges the pressing need for a significant quantum of new housing within its administrative boundaries, but which is explicit in its recognition that there may well be a requirement for the authority to absorb unmet need arising from elsewhere, which in this instance is Oxford City.

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.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? Yes - I wish to participate at the oral examination