



Gladman Developments Ltd

Vale of White Horse Local Plan 2031 Part 1

Examination Stage 1: Hearing Sessions

Matter 1 – Duty to Cooperate and Other Legal Requirements

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? Does the SA test the Plan against all reasonable alternatives in terms of the overall requirement for land for housing and employment and its broad spatial distribution?

- 1.1 Gladman submits that the Councils' Sustainability Appraisal (SA) does not adequately and fully assess all reasonable alternatives in terms of the overall requirement for housing in the Local Plan to the submitted Plan strategy and therefore fails to meet the requirements of the 2004 Planning and Compulsory Purchase Act or the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 At the time the SA was finalised, the Council would have been aware that the unmet housing need for Oxford had been quantified as being between 13,788 and 21,788 dwellings for the period 2011 to 2031. It would also have been aware that, through the ongoing work of the Oxfordshire Growth Board, a proportion of that unmet need would have to be delivered in the Vale of White Horse Local Plan. The SA fails to consider however, as a reasonable alternative, a strategy that addresses the housing need for the Housing Market Area as a whole, that is a level

of housing growth in Vale of White Horse district that delivers a reasonable proportion of the unmet housing need for Oxford City.

- 1.6 Gladman notes the Council is required to consider all reasonable alternatives in its SA and that there have now been a number of instances where the failure to undertake a satisfactory SA has resulted in plans failing the test of legal compliance or led to an Examination suspension. If it cannot be robustly demonstrated that the development of the Local Plan has taken place with full regard to the requirements for SA this should be viewed as a legal failure in the Plan's preparation.