



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

First Name

Last Name

Job Title

(where relevant)

Organisation

(where relevant)

 Redrow Homes

Address Line 1

 C/O Agent

Line 2

Line 3

Line 4

Post Code

Telephone Number

E-mail Address

(where relevant)

2. Agent's Details (if applicable)

Mr

Robert

Barber

Director

Pegasus Group

3 Pioneer Court

Chivers Way

Histon

Cambridge

CB24 9PT

01223 202 100

robert.barber@pegasuspg.co.uk

Part B – Please use a separate sheet for each representation

Name or Organisation :

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

Paragraph

5.39-5.42

Policy

CP13

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

YES

No

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

Yes

No

NO

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

Yes

YES

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.

See Attached Sheet

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.

At present Core Policy 13 is unsound in the context of paragraph 182 of the NPPF.

As presently drafted neither Core Policy 13, nor the associated text, succinctly describe the exceptional circumstances that exist in the Vale of White Horse to revisit the present extent of the Green Belt boundary. Accordingly, a modification is required to render the Local Plan sound.

In order to strengthen Core Policy 13 we recommend a change to the policy wording to link the identification of site allocations in Core Policy 3 and Core Policy 4 to the Green Belt purposes described in Paragraph 80 of the NPPF.

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

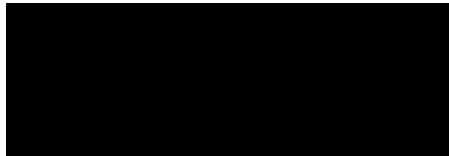
Yes, I wish to participate at the oral examination

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

The Local Plan raises the importance of delivering the City Deal. Redrow Homes is a key stakeholder in this process and feels that it is of vital importance that we participate in the examination hearings to explain and explore the critical strategic issue of housing delivery and appropriate Green Belt release, in the context of the NPPF and the City Deal.

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:

18.12.14.

Question 5 - Additional Sheet

Redrow Homes is of the view that the consideration of Core Policy 13 and its reasoned justification should be undertaken within the context provided by the approach advanced in the NPPF regarding the achievement of sustainable patterns of growth. The policies in paragraphs 18-219 of the NPPF, taken as a whole, constitute the Government's view of what sustainable development in England means in practise for the planning system.

The NPPF seeks the alignment of economic and housing evidence in order to support the delivery of necessary economic growth. The Local Plan is supported by an up-to-date SHMA and SHLAA which in our assessment meet the requirements of the NPPF. The strategy arising from these evidence base documents has allowed the Council to support the Government objective to deliver sustainable economic growth and plan proactively to support an economy fit for the 21st century, as outlined in paragraphs 19 and 20 of the NPPF respectively. The three dimensions of delivering sustainable development (economic, social and environmental) are inextricably interrelated; therefore it is of vital importance that the evidence base underpinning a Local Plan is considered as a whole.

Any review of existing Green Belt boundaries cannot be considered in isolation but must be undertaken in the plan-making process in the context of the key roles established at paragraphs 7 and 8 of the NPPF. Paragraph 10 of the NPPF requires that Plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas. The Oxford and Oxfordshire City Deal provides a highly significant local focus for the preparation of the publication version.

As noted above, the implementation of the policy requirements of the NPPF needs to be considered alongside the content of the Oxford and Oxfordshire City Deal (January 2014). The City Deal, agreed by the Government, outlines that despite Oxfordshire's wealth of world-class assets it has underperformed. A key aspect boosting the performance of Oxfordshire and increasing economic investment in the area is delivering new housing development. Indeed, the City Deal states that the demand for housing in the area has '*outstripped*' supply and the delivery of '*housing is essential for the future of the knowledge economy in Oxford and Oxfordshire*'.

The SHMA (2014) has established the housing requirement arising across the Oxfordshire Housing Market Assessment (HMA), including the Vale of White Horse district. The outcome of this up to date assessment has informed the identification of the objectively assessed housing need for the district as required by paragraphs 159 and 47 of the NPPF. Accordingly this has been incorporated into the Local Plan as the objectively assessed housing need requirement. The Council's approach is compliant with the requirements of the City Deal which states that Oxford and Oxfordshire will commit to delivering '*the necessary sites that will meet the housing needs outlined in the SHMA*'. As outlined in our representations on Core Policy 2, the approach adopted in the Local Plan is also consistent with the duty-to-cooperate as per the requirements of the NPPF. Redrow Homes supports the aims and objectives of the City Deal and is committed to working with the key stakeholders to help meet the clear housing need in the area.

The Sustainability Appraisal Report for the Vale of White Horse Local Plan 2031 Part 1 (October 2014) contains an assessment of a range of options and alternatives in respect of delivering the quantum and location of new housing development. Indeed, the Sustainability Appraisal assesses nine housing delivery scenarios ranging from 13,294 to 20,560 dwellings to be delivered over the plan period. Paragraph 12.3.13 of the Sustainability Appraisal states that,

"A mix of sites are required that would deliver homes in the short as well as longer term to restore and maintain a five year housing land supply. Therefore in order to achieve this it has been necessary to consider sites in AONB and Green Belt."

The Council's approach to housing growth is clearly outlined in Chapter 11 of the Sustainability Appraisal. Indeed, Chapter 11 makes it clear that in pursuing the Council's preferred option for housing growth there would be 'trade-offs', in respect of socio economic impacts versus environmental impacts. However, the Sustainability Appraisal makes it clear that any perceived negative implications can be successfully mitigated. In light of the above, Redrow Homes consider that the Council's preferred option for housing growth has been evaluated against a range of potential alternative scenarios and developed for plan making purposes as it will contribute to the achievement of sustainable development as required by the NPPF and will deliver the positive economic growth initiative enshrined in the City Deal.

The proposed housing target of 20,560 and the proposed site allocations are fully compliant with the spatial strategy '*building on our strengths*' as evaluated in the Sustainability Appraisal process, and will deliver the required housing and economic growth, which is of national importance. The three sub-areas identified to deliver the necessary and sustainable growth (Abingdon-on-Thames and Oxford Fringe, South East Vale and Western Vale) will enable the Council to meet, in full, its objectively assessed housing need, supporting the forecast growth in employment opportunities.

Redrow Homes consider that the Council's approach is consistent with the requirements of paragraph 10 of the NPPF which outlines the need for Plans '*to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas*'. The Spatial Strategy outlined in the Local Plan is considered to be a sound, positive and proactive approach to meeting the Council's full objectively assessed need, meeting the requirements of Paragraph 47 and 182 of the NPPF. The City Deal responds to the Government's commitment to securing economic growth set out at paragraph 18-20 of the NPPF and a review of existing Green Belt boundaries should be seen in this context, providing the basis for the identification of exceptional circumstances referred to at paragraph 83 of the NPPF.

The Green Belt was defined many years ago and the opportunity can now be taken through the preparation of the Local Plan to refresh those existing Green Belt boundaries, within the context provided by paragraphs 80 and 83 of the NPPF. Paragraph 83 of NPPF makes it clear that Green Belt boundaries can be altered in exceptional circumstances. The Local Plan is underpinned by the Green Belt Review Final Phase 2 Report (February 2014). The Green Belt Review, produced independently on behalf of the Council, presents a sound and sustainable strategy to assess the integrity of land on the edge of settlements and the extent to which this land satisfies the five purposes of Green Belt as outlined in Paragraph 80 of the NPPF. The Green Belt Review confirms that,

"The Oxford Green Belt has remained predominantly intact since it was approved in 1975. As set out in the NPPF, production of the new Local Plan 2031 Part 1 is the appropriate time to consider whether exceptional circumstances have arisen that warrant alterations to the general extent of the Green Belt."

In assessing the need for Green Belt release, Redrow Homes acknowledge that in *Topic Paper 9: The Natural Environment* the Council has considered the content of the NPPG in respect of whether meeting their full objectively assessed housing need would result in any adverse impacts which would significantly and demonstrably outweigh the benefits.

In light of all of the above Redrow Homes consider that there is a set of exceptional circumstances which clearly justifies Green Belt release as a spatial concept. The Council's approach to release appropriate sites from the Green Belt, is supported by:

- The immediate need to deliver housing growth in order to support the aims and objectives of the Oxford and Oxfordshire City Deal, as agreed by Central Government in January 2014;
- The need to deliver economic growth in Oxfordshire, which is of national importance.
- The requirement for the planning system to deliver all three dimensions of sustainable development (Paragraph 7 of the NPPF);
- The need for Plans and decisions to take into account local circumstances in order to achieve sustainable development (Paragraph 10 of the NPPF);
- The need for the planning system to be genuinely plan led (Paragraph 17 of the NPPF)
- The need to ensure that planning proactively drives and supports sustainable economic development to deliver the homes, employment opportunities and thriving local places that the country needs (paragraph 17 of the NPPF); and
- The need for local planning authorities to plan for economic growth in order to develop an economy fit for the 21st century (paragraph 20 of the NPPF).

Having reviewed the evidence base Redrow Homes concludes that the proposed Green Belt releases are a result of a robust Green Belt Review prepared in the light of Paragraph 83 of the NPPF. Accordingly, it is considered that the sites proposed for release are those that will not damage the integrity of the Green Belt following their removal. Paragraph 85 advises that the definition of Green Belt boundaries should ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development and not include land which it is unnecessary to keep permanently open. Redrow Homes consider that the process undertaken in completing the Green Belt Review satisfies Paragraph 85. Appropriate sites, identified following a focused and limited Green Belt Review can be released from the extent of the Green Belt as it would be inappropriate to retain it within the Green Belt, given that it is unnecessary to keep it permanently open.

The Local Plan is shaped by the requirement to meet objectively assessed housing needs, which responds to the aims and objectives of the City Deal, and robust evidence that can be tested. Small and focused Green Belt review, in combination with delivering other non-Green Belt sites will make a material contribution to meeting objectively assessed housing need and accommodating economic growth. The policy advocated in the Local Plan still protects those areas making a meaningful contribution to the achievement of Green Belt purposes. Redrow agrees with paragraph 5.42 of Local Plan which states,

"Some of the sites identified as strategic allocations within this plan have been historically located within the Oxford Green Belt..... The sites all fall within land that has been identified through the local Green Belt Review to no longer meet the purposes of the Green Belt".

Redrow Homes support the content of Core Policy 13, wherein the Council states that it is proposing to release land from the Green Belt to accommodate strategic development at a number of locations in the Abingdon-on-Thames/Oxford Fringe

Sub-Area, including South of Kennington. The proposed release of land from the Green Belt has been informed by the Green Belt Review, which incorporates an assessment of the role that tracts of land play in addressing the stated purposes of including land within the extent of a Green Belt. Redrow Homes endorse the observation at paragraph 22 of the Council's comments on the Green Belt Review Final Report that *"we think that land should only be released from the green belt if it is developable and would constitute sustainable development."*

The Green Belt Review recommended that location 13 (South Kennington) should be released from the Green Belt. The site is well contained by the existing settlement, does not form part of the wider countryside and does not exhibit the particular characteristics required to retain land in the Green Belt. The Council's commentary on the Green Belt Review (February, 2014) notes that *"this site performs well in Green Belt and landscape terms and would be appropriate for development."* Accordingly, Redrow Homes endorse the proposed release of sites from the Green Belt in order to deliver sustainable development and meet the identified housing need in the district. Indeed, the release of sites from the Green Belt, such as location 13, and subsequent delivery of housing development, is of critical importance in order for the Council to maintain a robust five year housing land supply moving forward.

The Sustainability Appraisal Report for the Vale of White Horse Local Plan 2031 Part 1 (October 2014) contains assessments of various sites presently located within the Green Belt. The Summary contained within the Sustainability Appraisal: Appendix 12 states that South Kennington (Site 25) is one of only two locations deemed to exhibit *"a high capacity for development and would have no negative effect on the Green Belt or landscape."* Indeed, the Appendix 12: Summary states that Site 25 is one of only three locations described as *"the best performing sites (i.e. those with no significant adverse effects)."*

The consideration given to Green Belt issues in the Sustainability Appraisal, the Green Belt Review and subsequent Council commentary on the Green Belt Review has clearly concluded that South Kennington represents an area of land that can be released from the Green Belt, without undermining its strategic purposes, as it is not necessary to keep it permanently open. At the same time, the identification of South Kennington as an allocation in the Local Plan will secure consistency with the NPPF requirements for sustainable development. Our assessment of the Council's evidence base indicates that the appropriate process has been followed through the preparation of the Green Belt Review Final Report and Sustainability Appraisal. Redrow Homes also notes that paragraph 5.41 of the Local Plan states that the Local Green Belt Review, supporting the Plan, does not preclude a further Green Belt Review (strategic in scale), should this be needed to meet any identified unmet housing need within the Oxfordshire Housing Market Area.

When considered in the light of the advice to be found at paragraphs 83-85 of the NPPF, Redrow Homes conclude that the Council has undertaken a robust review of the Green Belt and appropriately identified the proposed South Kennington allocation as a location which can accommodate new housing in a sustainable manner, reflecting the policies of the NPPF taken as a whole.

Paragraph 83 of the NPPF readily acknowledges that the plan making process can incorporate the review of existing Green Belt boundaries in exceptional circumstances. Redrow Homes believes that exceptional circumstances exist to warrant such a review in the district and consider that a modification is required to the reasoned justification for Core Policy 13 to render the Local Plan sound. As presently drafted the publication version does not succinctly describe the exceptional circumstances that exist in the Vale of White Horse to revisit the present extent of the Green Belt boundary. In order to strengthen Core Policy 13 we recommend a change to the policy wording to link the identification of site allocations in Core Policy 3 and

Core Policy 4 to the Green Belt purposes described in Paragraph 80 of the NPPF. Footnote 9 related to paragraph 14 of the NPPF refer to policies which indicate situations where development should be restricted. Redrow Homes would note that this does not state that development should be prevented / refused and that paragraph 83 of the NPPF does anticipate a reconsideration of Green Belt boundaries in appropriate, exceptional circumstances.