

## Comment

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<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Chilton Garden Centre
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**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)** No

**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.**

Redrow Homes considers that the housing requirement, outlined in Core Policy 4: Meeting our Housing Needs, represents the full objectively assessed need for the Vale of White Horse, as required by paragraphs 159 and 47 of the NPPF. Indeed the requirement of "at least 20,560" dwellings is taken directly from the SHMA update (2014). The Planning Practice Guidance describes an appropriate methodology for the assessment of future housing requirements. We believe that the approach taken in the preparation of the Oxfordshire SHMA follows that guidance by taking into consideration demographic factors, employment trends, market signals and the affordability of housing.

The robustness of the housing need figures contained within the SHMA 2014 is emphasised by the Inspector's Note No.2 into the Cherwell Local Plan Examination (9 June 2014), in which the Inspector suspended the examination of the neighbouring Cherwell Local Plan to allow the Council to plan "to meet the full, up to date, objectively assessed needs of the district, as required by the National Planning Policy Framework (NPPF) and based on the Strategic Housing Market Assessment (SHMA) 2014".

Given the above Redrow Homes consider that there is a clear indication from the Planning Inspectorate that the SHMA 2014 housing needs figures are the most up to date, relevant and robust. Accordingly, there is a clear consistency and synergy in the approach adopted by Cherwell District Council and Vale of White Horse District Council in the preparation of their respective Local Plans.

Redrow Homes supports the designation of Kennington as a "Larger Village" in Core Policy 4 and the policy wording in paragraphs 3 and 4, which outlines the approach to delivering sustainable development in locations outside of Market Towns, Local Service Centres and Larger Villages. However, to make Core Policy 4 effective and therefore sound, Redrow Homes suggest modifications are made to Core Policy 4 in order to emphasise that land will be considered for release from the Green Belt where it does not fulfil the purposes at paragraph 80 of the NPPF.

In the light of our comments on Core Policy 13 we consider that it is appropriate for the Council to proceed on the basis of meeting its objectively assessed need in full, notwithstanding the presence of the Green Belt in part of the district. The highly significant economic growth goals established in the City Deal require that the achievement of those goals is supported fully by the provision of adequate housing. The SHMA clearly identifies the link between economic success and the construction of adequate housing. In the context provided by the City Deal it is entirely appropriate for the objectively assessed need to be met in full in the Vale of White Horse district.

**Q5 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 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 4 is unsound in the context of paragraph 182 of the NPPF. To make Core Policy 4 effective and therefore sound, Redrow Homes suggest modifications are made to Core Policy 4 in order to emphasise that land will be considered for release from the Green Belt where it does not fulfil the purposes at paragraph 80 of the NPPF.

The suggested modifications to the wording of Core Policy 4 will result in the publication version exhibiting a direct relationship to the requirement at Paragraph 182 of the NPPF, that Local Plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

We also consider that the reasoned justification for Core Policy 13 should set out the exceptional circumstances which the Council has generally described in elements of its evidence base.

**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

*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.*

**Q7 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 issues of housing delivery.