

Mr Sam Townley

Neighbourhood Planning Enquiries Officer
South Oxfordshire and Vale of White Horse District Councils
135 Eastern Avenue,
Milton Park,
Oxfordshire OX14 4SB

3 January 2019

Ref: 29543

Dear Mr Townley

Thames Valley

5th Floor,
Thames Tower,
Station Road,
Reading, RG1 1LX,

nexusplanning.co.uk

Goring Neighbourhood Plan - Supplementary Directions 6 of 13th December 2018
Objection with respect to the Information Commissioner's Decision Notice of 13th September 2018
and the emerging South Oxfordshire Local Plan.

Gatehampton Road, Goring GNP 8

I write on behalf of my client in response to your email of 14th December 2018 enclosing the Supplementary Directions 6 with respect to the above. The directions advise that:

"3. A draft the South Oxfordshire Local Plan Publication Version (2034) was published alongside the papers for the Scrutiny Committee on 13th December 2018. This may be modified in advance of the Cabinet and Council meetings scheduled for 18th and 20th December respectively.

4. This is an emerging plan. The development plan to which basic condition (e) applies is the adopted development plan. However the reasoning and evidence informing the emerging local plan process may be relevant to the consideration of other basic conditions against which I am testing the neighbourhood plan."

I note that para 32 of the South Oxfordshire District Council (SODC) committee report which will be the subject of public consultation includes the following table:

Larger Village	Core Strategy + 15% growth	Up to date Completions and commitments	Outstanding housing requirement for NDP
Villages without allocations in this Local Plan			
Benson	383	854	0
Chinnor	594	796	0
Cholsey	612	585	27
Crowmarsh Gifford	312	494	0
Goring-on-Thames	329	96	233
Sonning Common	377	269	108
Watlington	262	305	0
Woodcote	225	94	131
Villages with allocations in this Local Plan			
Berinsfield	274	7	0
Chalgrove	248	339	0
Nettlebed	70	15	0
Wheatley	305	129	0

The table sets out the housing allocations for Larger Villages including Goring and highlights two fundamental flaws with the Goring Neighbourhood Plan:

1 It confirms the allocation in the Evidence studies that were contained within my representation of 22 August 2018.

The requirement for the Neighbourhood Plan is to allocate 233 dwellings but it only allocates a total of 94 houses. This is a significant shortfall. Para 29 of the NPPF clearly states that:

"Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies"

The failure to allocate sufficient houses is a fundamental flaw.

2 The numbers of dwellings that have been allocated to the villages does not reflect the analysis that is set out within the SODC Settlement Assessment Background Paper Updated October 2017. In that paper:

Cholsey scores 145	allocation 612
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Chinnor scores 176	allocation 594
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Goring scores 178	allocation 329
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So Goring which is allocated 329 dwellings scores more highly in terms of sustainability than Chinnor with an allocation of 594 dwellings and Cholsey with an allocation of 612 dwellings. Cholsey and Goring both have railway stations which are a key element of any sustainable settlement. Goring has an allocation that is approx. 54% of the other two settlements with lesser scores.

We will be drawing this inconsistency to the attention of SODC in a formal representation to the Local Plan. But this further confirms that GNP8 is in a highly sustainable location and should be allocated in the Goring Neighbourhood Plan.

Yours sincerely



Adrian Keal
Consultant Planner

Cc M Gilbert – Daniel and Gilbert