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

7 January 2019

Dear Mr Townley,

Goring Neighbourhood Plan Examination - Supplementary Directions 6

I write in response to the sixth supplementary directions issued by the examiner of the Goring Neighbourhood Plan (GNP) on 14 December. PRP has represented the owners of site GNP1 throughout the examination process and has made representations to the other supplemental directions issued by the examiner.

As pointed out by the examiner in the supplementary directions a draft version of the South Oxfordshire Local Plan Publication Version (2034) was published alongside the papers for the Scrutiny Committee on 13 December 2018. The draft Local Plan was subsequently approved by full council on 20 December and will commence consultation (under Regulation 19 of the Town and Country Planning Regulations) on 7 January 2019, for a period of 6 weeks until 18 February 2019. PRP will be making separate representations in relation to site GNP1 and the wider GNP as part of the regulation 19.

In the scrutiny version of the SODC Local Plan, Goring remains as a 'Larger Village' as set out in policy H4 which states:

*A housing requirement of **3,991 homes** will be delivered through Neighbourhood Development Plans and Local Plan site allocations at the Larger Villages as follows:*

- 27 homes at Cholsey
- **233 homes at Goring-on-Thames**
- 55 homes at Nettlebed
- 1108 homes at Sonning Common
- 131 homes at Woodcote

If a Neighbourhood Development Plan has not adequately progressed with allocating sites to meet these requirements within 12 months of adoption of this Local Plan, planning applications for housing in the larger villages will be supported provided that proposals comply with the overall housing distribution strategy as set out in Policy STRAT1.*

** the plan has reached submission stage and has allocated sufficient housing sites
This policy contributes towards achieving objectives 1, 2, 3, 4, 5, 6 & 7.*

The numbers set out in policy H4 represent a significant increase from the previous wording set out in policy H4 which planned for a total of **1,041 homes** with **140 homes at Goring-on-Thames**.

The Publication Version of the GNP sets out the following in section covering the Summary of the Plan:

Following the adoption of the South Oxfordshire District Council (SODC) Core Strategy 2012 Goring was advised that it should allocate sites for 105 new dwellings. This was the

start point for the Goring Neighbourhood Plan. Subsequently, SODC's emerging Local Plan 2011-2033, specified a target of 140 dwellings for Goring.

Policy 01 of the GNP sets out the 'Number of Dwellings to be Allocated' across the GNP area and states that:

New residential development in Goring will be focused on the four proposed housing allocations (site-specific Policies GNP2, GNP3, GNP6 and GNP10), which will deliver approximately 94 dwellings.

The provision of 94 dwellings represented only 67% of the previous SODC target of 140. Now that the target has been increased to 233 dwellings the current GNP target of 94 dwellings represents only 40% of the target.

The Guidance and Directions issued by the examiner on 27 June in advance of the hearing sessions set out there were a number of issues to be discussed at the hearings with the first being *whether the number of dwellings (94) in policy 01 [NDP page 35] is appropriate*. Given the increase in housing target it is appropriate that this issue should now be reconsidered.

The Planning Practice Guidance (PPG) sets out the circumstances when it is necessary to review and update a neighbourhood plan and states that (with emphasis added):
*There is no requirement to review or update a neighbourhood plan. However, policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a Local Plan that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes precedence. In addition, where a policy has been in force for a period of time, other material considerations may be given greater weight in planning decisions as the evidence base for the plan policy becomes less robust. To reduce the likelihood of a neighbourhood plan becoming out of date once a new Local Plan is adopted, communities preparing a plan should take account of latest and **up-to-date evidence of housing need**, as set out in guidance.*

[Paragraph: 084 Reference ID: 41-084-20180222]

Clearly there will be consideration by the GNP examiner and others towards the weight to be afforded to the increased housing target as set out in the regulation 19 of the emerging SODC plan. Paragraph 48 of the National Planning Policy Framework provides guidance on the weight to be afforded to emerging planning policy and states:

Local planning authorities may give weight to relevant policies in emerging plans according to:

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

In considering the weight to be provided to the emerging Local plan and in specific relation to the emerging housing requirements for SODC, these are drawn from the Oxfordshire Strategic Housing Market Assessment and make provision for addressing the unmet need of 3,750 new homes from Oxford City. It is appropriate to make the examiner aware of a linked appeal decision for SODC dated 24 December 2018 (*Appeal A: APP/Q3115/W/17/3187058 Land south of Greenwood Avenue, Chinnor, Oxfordshire OX39 4HN (nearest)* *Appeal B: APP/Q3115/W/17/3187059 17 and 19 Greenwood Avenue, Chinnor, Oxfordshire OX39 4HN*) and appended to this letter.

Both appeals were allowed. Of particular relevance to the GNP and the examiner in determining the weight to be provided to the increased housing target for Goring, is paragraph 14 of the decision letter which states that.

It is agreed that the adopted CS housing requirement is out of date as it was based on the now revoked South East Plan. Apart from the Council's figure in this case, all other studies use a higher requirement. The 2014 SHMA, described by the Council as "robust and up to date", indicates 725-825dpa, the emerging LP was proceeding on the basis of 945dpa, and the Oxford Housing Growth Deal (OHGD) assumes delivery of 1,023dpa towards the 100,000 by 2031. It is agreed that the emerging LP, and the consultation document, should only be afforded limited weight given the stage they have reached.

The Inquiry sat for 14 days between 6 June and 26 October 2018 and therefore the emerging Local Plan was at a significantly earlier stage of preparation than it is now currently, at regulation 19 stage. Nevertheless it is clear from the appeal decision that the Core Strategy Housing Requirement is out of date and therefore any reliance on this by the GNP should therefore be considered inappropriate.

Paragraph 34 of the decision notice goes on to state:

*PPG identifies that where, as here, there is a SHMA then any lower LHN will have to be justified. **In this case, post NPPF2, the SHMA has been found to be sound by an Inspector in West Oxfordshire District Council.** The SHMA takes account of economic growth and other factors, including affordable housing, and identifies an overall need for 100,000 dwellings or 5,000pa. Originally the Council identified the 775dpa in the 2014 SHMA as a realistic figure for housing need despite not addressing Oxford City's unmet need, which it is agreed is 15,000, or the OHGD commitment.*

Therefore whilst the weight applied to the emerging plan is still agreed to be limited, it is nevertheless increasing in weight as it progresses through the plan making process. Regardless of the weight to be applied to the plan in its entirety it is clear that significant weight can be applied to the emerging housing requirement and findings of the SHMA (particularly in light of the West Oxfordshire District Council plan being found sound).

We therefore invite the examiner to place substantial weight on the increased housing target for Goring as set out in the emerging LP and ask that further consideration is given to the appropriateness of the GNP target of 94 dwellings in light of this.

The PPPG sets out what happens if the trajectory indicates that there are insufficient sites/broad locations to meet the objectively assessed need (as is the case for the GNP) and states:

It may be concluded that insufficient sites/broad locations have been identified against objectively assessed needs. Plan makers will need to revisit the assessment, for example changing the assumptions on the development potential on particular sites (including physical and policy constraints) including sites for possible new settlements.

[Paragraph: 026 Reference ID: 3-026-20140306]

We have previously set out in our responses to Supplemental Direction that the hearing sessions should be reopened to reconsider the evidence submitted in relation to the landscape impact (with particular reference to the Bramhill Landscape reports). This would enable compliance with the advice set out in the PPG in relation to the housing trajectory and the revisiting of assessments.

Since the original hearing sessions in the summer of 2018 it is apparent that detailed consideration is required in respect of a range of issues. At present we do not consider that the GNP can be found sound and progress to referendum without consideration of other appropriate sites which can come forward to meet the increased need for Goring.

We look forward to hearing further from the examiner regarding the prospect of further hearing sessions.

Yours sincerely,



Andy Black
Director of Planning
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