

GORING-ON-THAMES PARISH COUNCIL

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All correspondence to be addressed to the clerk

7 January 2019

Mr Sam Townley
Neighbourhood Planning Enquiries Officer
South Oxfordshire and Vale of White Horse District Councils

By email.

Dear Mr Townley,

Goring Neighbourhood Plan 2018-2033 – For the attention of the Examiner

We refer to Supplementary Directions 6 and the draft emerging 2011-2034 Plan approved by SODC in December 2018 and subsequently published as the “South Oxfordshire Local Plan 2011 – 2034 January 2019 Final Publication Version 2nd (henceforth: LP2034).

The Neighbourhood Plan Basic Conditions Statement (BCS) demonstrated the GNP’s compliance with the NPPF (BCS Table 1), the adopted Local Plan 2011 and Core Strategy 2012, and its general conformity with the emerging Local Plan 2033 (see BCS Table 2). Whilst recognising the current consultative status of the new emerging Local Plan 2034 and that it may or may not be adopted in its current form, this letter and the attached tables comment on the potential impact of the policies of this emerging plan on the GNP.

We have been through the draft version in detail and have concluded that in most areas the changes are neutral to the policies or approach of the GNP. In a number of areas, the alignment between the local plan and the GNP would be strengthened, and in some areas, there are minor differences that we believe do not materially affect the GNP. Overall, we believe the GNP would continue to be in broad alignment with the strategic policies of the emerging local plan should this version be adopted.

We summarise the key points below and have attached two new tables that consider all of the policies of the emerging LP 2034 and identify where they relate to the GNP and their impact:

- Table 1 lists the policies in the emerging LP 2034 and comments on the relevance and impact of each policy to the GNP;
- Table 2 lists the policies in the GNP Examination Version and comments on the significance of the LP 2034 policies for the Plan. Where page numbers are quoted in this table, they refer to the pages in the Final

Clerk: Colin Ratcliff

In summary, the emerging LP2034 provides further clarification and stronger support for the strategic approach taken in the Goring Neighbourhood Plan to site allocation, protection of the AONBs, including landscape and visual impact assessment and flood risk management, including sequential testing within the designated Neighbourhood Area and the sites themselves. It supports the trajectory of housing development of the GNP, including appropriate housing numbers and density in the allocated sites, the support for affordable housing, the housing mix in the GNP and the importance of the detailed site-specific requirements.

Specifically, we see the most significant points to be as follows:

Housing Numbers and the Allocation of Sites

The emerging Plan strongly justifies the approach adopted by the GNP to identify appropriate sites, the number of new dwellings and the housing mix in Goring.

The LP2034 retains the simple, arithmetically derived, 15% growth target for housing for the larger villages in South Oxfordshire which was introduced in the superseded draft LP 2033, but the judgement previously applied, which reduced this to 140 homes for Goring in recognition of the AONB and flood risk constraints, has been removed and the full 15% (233 homes) applied. However, we note that the LP 2034 now clearly and unambiguously confirms the policy in the existing adopted LP that local factors such as AONB designation and the River Thames flood plain in Goring must be taken fully into account as part of the evaluation process for allocating sites and housing numbers and specifies the assessments that should be undertaken to evidence any reduction, as follows:

“The achievement of 15% growth figure needs to be balanced with the social, economic and environmental factors that may impact upon the ability of settlements to accommodate the amount of development that has been calculated. Consideration of the availability of suitable and deliverable sites may also impact on how much development a settlement can accommodate.

Some villages are constrained by factors such as the Green Belt, Areas of Outstanding Natural Beauty, and flood zones. Where Neighbourhood Development Plans are considering sites within an AONB or sites that form part of the setting of an AONB a Landscape and Visual Impact Assessment should be undertaken. In these villages a 15% growth may not be fully achievable. Other communities are unconstrained and can plan for more than 15% growth. The level of growth proposed should be evidenced within the Neighbourhood Development Plan with local communities helping to shape the development of their village. Ultimately the detailed evidence base will need to be provided to support each Neighbourhood Development Plan and its assessment of

capacity, whether this is to support a higher or lower number than provided in Table 5f: Provision of homes at larger villages”

These statements fully validate the approach adopted by the GNP, which included commissioning an independent LVIA (Bramhill supported by SODC’s Kirkham report) and an independently verified Flood Risk Assessment and Sequential Test (JBA). These important reports provide the evidence required by SODC and underpin the allocation of the 4 sites and 94 dwellings in Goring.

Housing Density

The LP2034 specifies a higher density of housing and specifically an increase in the larger villages from 25 to 45 dwellings per hectare. However, there is now a clear statement qualifying this density in the larger villages:

“Proposals that do not meet these densities will only be permitted where justified”.

The justification referred to is then further explained as follows:

“Where policies in this plan relating to habitats sites (and those sites listed in paragraph 176 of the NPPF) and/or designated Sites of Specific Scientific Interest; an Area of Outstanding Natural Beauty; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in a footnote 63 of the NPPF; and areas at risk of flooding provide a clear reason for reducing density thresholds”

These statements provide further justification for the the approach adopted by the GNP that housing density in the allocated sites should reflect their surrounding environment and take full account of the AONBs and flood zones. The average density proposed in the GNP is approximately 25 dwellings per hectare in the developable areas of the proposed sites, ranging from 40 per ha in GNP10 to lower densities in the rural fringe of the village.

Flooding and Drainage

Specifically related to flooding and drainage, the LP 2034 makes clear statements as follows:

"The suitability of development proposed in flood zones will be strictly assessed using the "Sequential Test", and where necessary, the "Exception Test". A sequential approach will be used at site level. A Site-Specific Flood Risk Assessment (SSFRA) should be provided for all development in Flood Zones 2 and 3."

“The council will uphold the sequential approach to flood risk. Neighbourhood planning groups considering proposing development within areas at risk of flooding must apply the Sequential Test to the whole Neighbourhood Area.”

“If necessary, the Exception Test should also be applied. The Environment Agency provide bespoke advice where developments in high flood risk areas require a site-specific flood risk assessment. Should mitigation be required, the Council will expect those measures to be in the application proposals and part of the development.”

The approach adopted by the GNP of obtaining an independently verified Flood Risk Assessment and Sequential Test (JBA), which provides the required evidence and underpins the allocation of GNP3 and the design of the site, is in full alignment with, and validated by, this policy. Detailed mitigation is provided in the site-specific requirements in the site allocation policy for GNP3. In addition, the LP2034 also makes it clear that the Sequential Test should be applied to the Neighbourhood Area, which is the approach adopted in the GNP.

Masterplan and Site-specific Requirements

The LP 2034 specifies that a Masterplan must be produced for all allocated sites and include comprehensive design details. The GNP policies for allocated sites already include the requirement for a Masterplan (as part of the planning application) and then identify a set of specific requirements relating to the unique circumstances in Goring. In the GNP these detailed requirements are shown as site-specific requirements, which are essential mitigation to make the sites acceptable for development.

Affordable Housing

The LP2034 proposes a lower threshold of 5 rather than 6 dwellings for affordable housing in developments within the AONB. It has the same split between rented and home ownership as GNP Policy 05 but gives further detail on the tenure mix of social and affordable rented. This is a matter of detail, and the LP 2034 policy will take precedence if it is adopted.

Housing Mix

The GNP has provided clear evidence that demonstrates the need in Goring for a significant proportion of new houses to be 1, 2- or 3-bedroom properties. GNP Policy.03 (Housing Mix) remains in alignment with the LP 2034 on housing mix which specifically allows for conformity with Neighbourhood Development Plan evidence.

Rate of Development of New Houses

The LP 2034 detailed development trajectory assumes the allocations for large villages will be completed between 2021 and 2034. The GNP has allocated all

suitable sites from those proposed to it in the call for sites and all of the sites allocated are expected to be delivered by the end of March 2033, with the majority being developed within the first 2 to 3 years. The GNP is therefore fully supportive of the development trajectory. Furthermore, the Goring Neighbourhood Plan is required to be reviewed and refreshed within a five-year period, allowing for new sites to be submitted for consideration.

In conclusion, we believe that the emerging LP 2034 is consistent with the thinking behind the GNP, strengthens the justification for the approaches taken in the Plan, and that no material changes would be required to the Plan in the event the emerging local plan were to be adopted in its current form.

We hope that this letter and the attachments are helpful to the examination process.

Yours sincerely

Colin Ratcliff, Clerk
For and on behalf of The Neighbourhood Plan Steering Group,
Goring on Thames Parish Council