

Goring Neighbourhood Plan Supplementary Directions 2 of 19th July 2018 Reg 16 Consultation – Objection with respect to NPPF (July 2018)

Gatehampton Road, Goring GNP 8

Date 22 August 2018

Introduction

This representation is made by Adrian Keal of Nexus Planning on behalf of PBI 2 Ltd who own the land referred to in the Goring Neighbourhood Plan (GNP) as GNP 8.

On 19th July the Independent Examiner allowed comments to be submitted in response to the revised NPPF (the NPPF) that was published on 24th July 2018.

These representations are in response to the opportunity to comment upon the NPPF of July 2018 and explain how it further supports the allocation of GNP8.

We wish to draw attention to the following paragraphs of the NPPF that are pertinent:

Chapter 2. *Achieving sustainable development* states at para 13:

"The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."

Chapter 3. *Plan-making* states at para 16:

"Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development¹⁰;*
- b) be prepared positively, in a way that is aspirational but deliverable; "*

It goes on to state at para 29:

"Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by

influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies ¹⁶

¹⁶ Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area."

Chapter 5. *Delivering a sufficient supply of homes* states at para 68:

"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved; "

It goes on to state at para 69:

"Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area."

The guidance within the NPPF July 2018 confirms that the proposed Goring Neighbourhood Plan is not compliant with the Basic Conditions Statement because:

1 Failure to be "in conformity with strategic policies in the development plan"

The Goring Neighbourhood plan does not "*support the delivery of strategic policies contained in local plans or spatial development strategies*" in this case the South Oxfordshire Local Plan.

The Adopted SODC Core strategy allocates 1,154 houses to the 12 larger villages in the Site Allocations DPD. Goring is designated as a larger village. It is within the AONB and is designated as a Local Service Centre in Policy CST1 Town Centres and Shopping.

The Evidence Studies for the emerging Local Plan for South Oxfordshire includes a range of reports that have helped to inform the emerging Local Plan. This includes the Larger villages allocation. This states:

"Larger Villages with Neighbourhood Development Plans will make their own housing allocations using the guidelines specified in the emerging Local Plan. This states that the Council would expect that the number of houses identified for each larger village to be built in the plan period to be the number identified in the Core Strategy plus 15%, less completions and commitments. This information can be found on the table here"

The table allocates 140 houses to Goring-on-Thames, see attached. The Neighbourhood Plan 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 Failure to allocate "small sized sites" that are "deliverable"

GNP 8 is available and deliverable. It is:

- close to Goring railway station (5 minute walk) and to the village centre (10 – 15 minute walk).
- a small site of less than 1 ha (ie 0.6 ha) and has the capacity for between 6 and 16 dwellings, as indicated on sketch plans that have been provided.
- in a single ownership and there are no practical impediments to its delivery.
- on the edge of the village and is well outside the flood risk areas.
- the subject of an ecological assessment that has demonstrated that there are no protected species on the site.
- adjoining the existing settlement and has good vehicular access direct on to Gatehampton Road. A site of this size will have negligible impact on the surrounding road network.
- defined by well established boundaries and some initial boundary planting has been undertaken to the east and south, and this can be augmented.

Conclusion

The omission of this site renders the Goring Neighbourhood Plan non compliant with the Basic Conditions Statement. This small site is very sustainable and is compliant with the guidance set out in the NPPF, and it should be allocated for housing.

Larger village	Core Strategy + 15% growth	Completions and commitments	Outstanding	Target for NDP
Benson	383	514	0 (+131)	0
Berinsfield	274	5	269	0
				Strategic allocation
Chalgrove	248	16	232	0
				Strategic allocation
Chinnor	594	777	0 (+183)	0
Cholsey	612	459	153	175
Crowmarsh Gifford	312	224	88	110
Goring-on-Thames	329	96	233	140
Nettlebed	70	11	59	46
Sonning Common	377	249	128	150
Watlington	262	28	234	260
Wheatley	305	107	198	0
				Strategic allocation (Holton parish)
Woodcote	225	89	136	160
Total	3,991	2,575	1,031	1,041