

Policy and Programmes

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Listening Learning Leading

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Dear Mr Ashcroft

Woodcote Neighbourhood Development Plan Review – South Oxfordshire District Council response to Examiner’s Clarification Note of 2nd March 2022

In your clarification note dated 2 March 2022 you raised the following points for the District Council to address:

To what extent did the District Council and the Planning Inspector grapple with the specific issues associated with the delivery of a 15% increase in the number of dwellings in Woodcote as part of the preparation of the Local Plan 2035?

To what extent do the provisions of paragraph 4.28 of the Local Plan apply specifically to the neighbourhood area?

What is the current housing land supply in South Oxfordshire?

Does the District Council have a more up to date version of Table 4f in the Local Plan?

To what extent did the District Council and the Planning Inspector grapple with the specific issues associated with the delivery of a 15% increase in the number of dwellings in Woodcote as part of the preparation of the Local Plan 2035?

In response to the first question, the South Oxfordshire spatial strategy was well scrutinised at the Local Plan examination and ultimately was a key part of the Plan that was found sound and adopted in December 2020. The provision of 15% growth in the Larger Villages, including Woodcote, was part of the spatial strategy examined.

The District Council in its approach towards a proportionate level of growth at Larger Villages, took account of specific circumstances of individual settlements. Paragraph 4.28 of the South Oxfordshire Local Plan sets out:

'Some villages are constrained by factors such as 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 villages 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 that provided in Table 4f: Provision of homes at Larger Villages. Neighbourhood planning groups will need to cooperate with infrastructure providers and statutory consultees to provide this evidence, and develop viable solutions for any infrastructure provision that is needed.'

The District Council recognises that certain constraints may mean a 15% growth may not be fully achievable and grapples with this in the Local Plan. This is dealt with paragraph 4.28, which acknowledges constraints and sets out the need for a detailed evidence base for NDPs to support a higher or lower housing requirement than that provided in Table 4f. This element of the strategy has been present as the Local Plan has progressed through the plan making process. The District Council started to grapple with this issue early on, acknowledging the constraints of villages in early plan preparation documents, including the Second Preferred Options Document published in March 2017. This narrative continued throughout further versions of the Local Plan and remains in the adopted Local Plan 2035. It is therefore evident that this element of the Local Plan spatial strategy is well established and has been consulted on many times, as well as being found sound at examination.

Matter 5 of the examination focussed on this matter. The Inspector asked a series of questions including: Is the spatial strategy sound? Is the plan's spatial strategy an appropriate strategy for meeting housing, employment, community and other needs in the right places whilst protecting the environment? The Council provided written responses (available [here](#)), as well as discussing the matter with the Inspector and other interested parties at the hearing sessions. Following the hearing sessions the Council issued a note on growth of the Towns and Larger Villages (document reference: PSD65 – Matter 5 – SODC – Growth of the Towns and Larger Villages, available [here](#)), which explains the origins of the figures the Local Plan sets for neighbourhood plans to allocate in Table 5d and 5f (tables 4d and 5f in the adopted version of the Local Plan).

In conclusion, after receiving the written responses and the hearing sessions, the Inspector sets out in paragraphs 60 and 61 of his Inspector's Report (available [here](#)):

'60. The spatial strategy also includes proportionate roles for the market towns of Wallingford, Henley-on-Thames and Thame, and different categories of villages.

61. In evolving the spatial strategy, the Council has considered all the options for development in the above locations, together with the larger villages, the edge of Reading and a free-standing settlement related to the Oxford to Cambridge Arc. The strategy that was been finally selected has innate logic and integrity. It seeks to fulfil important public objectives in delivering development to meet identified needs in a sustainable manner.'

The spatial strategy, including the proportionate approach taken at Larger Villages was found to be sound, logical, justified on the evidence, and integrated.

In his report, the Inspector then goes on to directly discuss the strategy in relation to the villages and the countryside. Specifically relevant to Larger Villages, which would include Woodcote, paragraphs 190 and 191 of the report states:

'190. For the larger villages, the Plan proposes 15% growth calculated in the same way as for the market towns. This is a proportionate approach which takes into account the existing size of the villages. The overall requirement of 499 homes, and the residual requirements, are set out in Policy H4: Housing in the larger villages. MM26 updates the figures in the policy and the accompanying table to take into account revised capacities and completions. The requirement is now 257 homes.

191. Owing to their size, location and limited range of facilities, it is not appropriate, with two exceptions, to rely on the larger villages to play more than a modest role in meeting the District's needs. The exceptions of course are Berinsfield and Chalgrove, for the special reasons discussed above. It is not therefore necessary to modify Policy H4 to provide greater flexibility to deliver homes in the same way that MM25 does for Policy H3.'

Main modification 26, was the only modification made to Policy H4 in the Local Plan, following the examination. This modification did not affect the spatial strategy, as set out in the Inspector's Report, it was a factual update to update the figures in the policy and accompanying table and text.

Another wider issue which the Inspector grappled with during the examination of the South Oxfordshire Local Plan was whether the Green Belt, heritage assets, biodiversity, landscape, infrastructure and the Council's declared climate emergency were reasons to reduce the housing requirement. In respect of landscape considerations paragraph 49 of the Inspector's Report states:

'49... There is no reason why meeting the housing requirement should adversely affect the District's two AONBs. They are not touched by the strategic allocations; it is possible that there may be views of some of the allocations from them, but not to the extent that their attractiveness or character would be harmed. The Plan's provision for growth at the market towns in Policy H3 as modified by MM25 (see Issue 3) is proportionate and there is no evidence that growth at the scale envisaged would harm the AONBs. In any case, additional development anywhere within the plan area would still need to comply with Policy ENV1 which protects the AONBs, the landscape and the countryside.'

The Inspector reached the conclusion that the Local Plan’s housing requirement were justified and sound and that none of the matters including landscape considerations, individually or cumulatively, justified a reduction in the housing requirement.

Therefore, we consider that the District Council and Planning Inspector sufficiently grappled with the issues associated with the delivery of 15% growth at all Larger Villages, including Woodcote. The Inspector concluded that the spatial strategy, including the proportionate approach taken at the Larger Villages was sound. Paragraph 14 of the NPPF is clear that neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies. Therefore, the Woodcote Neighbourhood Plan Review should be seeking to support the spatial strategy of the Local Plan.

To what extent do the provisions of paragraph 4.28 of the Local Plan apply specifically to the neighbourhood area?

The provisions of paragraph 4.28 of the Local Plan would apply to the neighbourhood area of Woodcote, because it is in the Chilterns AONB and AONB is one of the constraints listed as examples in para 4.28 (Green Belt, Areas of Outstanding Natural Beauty, and Flood Zones). As per our comment in response to the Regulation 16 consultation, we believe it is important that the right balance between the capacity and the constraints of the settlement is achieved.

What is the current housing land supply in South Oxfordshire?

The current housing land supply in South Oxfordshire is 5.33. This is set out in the June 2021 Local Plan Housing Land Supply Statement published on our website (direct link [here](#)).

Does the District Council have a more up to date version of Table 4f in the Local Plan?

The Local Plan does not provide for updates to table 4f. Table 4f shows the provision of homes at Larger Villages with completions and commitments as of 1 April 2020. We have prepared table 1 below which shows completions and commitments in Woodcote as of 1 April 2021.

Completions	Commitments	Total
31	72	103

Table 1 – As of 1 April 2021

Yours Sincerely,

Robyn Tobutt

Robyn Tobutt
Senior Planning Policy Officer (Neighbourhood)