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**Stage 3 of the Examination of the Submitted  
Tunbridge Wells Borough Local Plan**

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**STATEMENT FOR:**

**MATTER 1 – GREEN BELT ASSESSMENT,  
SUSTAINABILITY APPRAISAL AND LOCAL PLAN  
REVIEW**

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**WRITTEN STATEMENT**

**Prepared by:**

**Woolf Bond Planning Ltd**

**On behalf of:**

**Castle Hill Developments Ltd**

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**May 2024**

**WBP Ref: 8092**



**Woolf Bond Planning**  
Chartered Town Planning Consultants

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## **CONTEXT AND BACKGROUND**

- 1.1. This Statement has been prepared by Woolf Bond Planning Ltd on behalf of Castle Hill Developments Ltd (“CHD”), and addresses several questions posed for Matter 1 of the Hearing Sessions as set out in the Inspector’s Matters and Issues for the Third Stage of the Examination.
- 1.2. In setting out our response, we continue to rely upon the content of the detailed representations submitted on behalf of CHD in response to the Regulation 19 consultation on the Draft Local Plan in June 2021, alongside the subsequent response submitted to the Proposed Modifications in January 2024.
- 1.3. This Statement amplifies our Regulation 19 representations together with those provided on the Proposed Modifications and details further responses to a number of the specific questions raised by the Inspector in his third stage of the examination of the Local Plan.

**MATTER 1: GREEN BELT ASSESSMENT, SUSTAINABILITY APPRAISAL AND LOCAL PLAN REVIEW**

***Issue 1: Green Belt Study Stage 3 Addendum***

**Q1. Does the Stage 3 Addendum<sup>1</sup> adequately address those concerns raised in the Inspector's Initial Findings that sites had not been considered on a consistent basis where harm to the Green Belt is concerned?**

- 2.1. As indicated in the response to question 2, CHD disputes that the Stage 3 Green Belt Addendum has adequately addressed the Inspector's Initial Findings. In addition, the Green Belt parcel on the northern edge of Royal Tunbridge Wells effectively comprised the entire area between the town and Tonbridge to the north. The Stage 3 Green Belt appraisal should have included a finer grain assessment of this large parcel where we fundamentally believe that a different conclusion in terms of Green Belt function and degrees of harm would have been identified. Bearing in mind the NPPF<sup>2</sup> is clear that any alterations to the Green Belt should be aligned with sustainable patterns of development, the area to the north of Royal Tunbridge Wells clearly falls within this category. The absence of any assessment of this area in response to the Inspector's commentary on the Green Belt study is at best unjustified and represents a significant question mark to the Council's response to the Inspector's initial findings.

**Q2: What is the list of reasonable alternative site options in Table 2.1 based on and have an appropriate range of options been tested?**

- 2.2 In respect of the list of alternative site options in Table 2.1, the Council's "Development Strategy Topic Paper Addendum" at paragraph 2.12 (PS\_054) indicates that they discounted any site that lay within both Green Belt and AONB as a potential reasonable alternative. This does not reflect the approach followed for employment sites as illustrated by the inclusion of

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<sup>1</sup> Examination Document PS\_035

<sup>2</sup> NPPF paragraph 142.

an allocation for land off Kingstanding Way which lay in both designations<sup>3</sup>. This is therefore a clear indication of the inconsistency of the Council's approach and that the Plan as both submitted and as modified is not justified.

- 2.3 Given that the Sustainability Appraisal has not considered relevant and appropriate reasonable alternatives, the Addendum review has likewise failed in this. Therefore, an appropriate range of options has not been tested. This should have been broadened to have included the land north of Royal Tunbridge Wells.

**Q3. How did the Council use the information from the Stage 3 Addendum to determine whether or not exceptional circumstances exist to alter the Green Belt boundary as proposed by the submission version Local Plan?**

- 2.4 This is a matter for the Council.

**Q4: The Stage 3 Addendum found that some sites (around Five Oak Green) would only cause Low or Low-Moderate harm to the Green Belt. Given that the Plan seeks to meet housing needs in full, but will only provide for around 10 years' worth of housing land supply, why have these sites not been considered for allocation as part of the examination of this Plan?**

- 2.5 This is a matter for the Council.

**Q5. Where relevant, have the findings in the Stage 3 Addendum been used to update the Strategic Housing and Economic Land Availability Assessment?**

- 2.6 This is a matter for the Council.

***Issue 2 – Sustainability Appraisal Addendum***

**Q1. Has the Sustainability Appraisal Addendum adequately considered the suggested spatial strategy (i.e. a Plan without Tudeley Village and reduced development in East Capel) against reasonable alternative spatial options?**

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<sup>3</sup> See paragraphs 10.36-10.41 of the Representations to the Draft Submission Plan.

- 2.7 As previously outlined in the representations to the Draft Submission Plan alongside those to the Proposed Modifications, the Council’s Sustainability Appraisal has failed to consider a strategic allocation at Castle Hill, (land north of Royal Tunbridge Wells) as a potential alternative.
- 2.8 Whilst the Council’s “Development Strategy Topic Paper Addendum” at paragraph 2.12 (PS\_054) indicates that they discounted any site that lay within both Green Belt and AONB as a potential reasonable alternative, this does not reflect the approach followed for major employment sites as illustrated by the inclusion of an allocation for land off Kingstanding Way which lay in both designations<sup>4</sup>. This is therefore a clear indication of the inconsistency of the Council’s approach and that the Plan has both submitted and as modified is not justified.
- 2.9 Given that the Sustainability Appraisal has not considered relevant and appropriate reasonable alternatives and has the ability to be updated, the Addendum review has likewise failed in this.

**Q2: If the Plan does not provide sites sufficient to meet the housing requirement, have the implications been considered against reasonable alternative options that *would* meet housing needs?**

- 2.10 No. As indicated in the representations to the proposed submission plan and the Main Modifications, there are clear opportunities for inclusion of further sites, including land north of Royal Tunbridge Wells at Castle Hill. This was an appropriate solution for contributing towards addressing the borough’s housing needs, given that development on the adjoining site off Kingstanding Way (also within both AONB and Green Belt) was considered necessary to address the borough’s employment needs, notwithstanding the availability of land outside of these designations at Paddock Wood<sup>5</sup>.

**Q3. Have the suggested Main Modifications been subject to Sustainability Appraisal?**

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<sup>4</sup> See paragraphs 10.36-10.41 of the Representations to the Draft Submission Plan.

<sup>5</sup> See paragraphs 5.45 & 5.46 of the Representations to the Draft Submission Plan.

2.11 This is a matter for the Council.

***Issue 3 – Proposed Strategy and Early Review***

**Q1. What is the justification for suggesting Main Modifications to the Plan, and subsequently requiring an immediate Review, rather than seeking to meet housing needs as part of this examination?**

2.12 The NPPF (paragraph 60) emphasises the Government’s objective of significantly boosting the supply of housing.

2.13 Although the preference of CDH is for the Council to agree a Local Plan that both meets the housing needs of Tunbridge Wells Borough alongside ensuring it covers at least 15 years post adoption (as obligated by NPPF paragraph 22), given that the Borough’s uncapped housing need is significantly above the capped requirement<sup>6</sup>, an early review provides the opportunity for a further boost to fully address the Local Housing Need which would contribute towards the wider objectives as set out in NPPF paragraph 60. Such an early review to address the uncapped housing need for the borough would accord with the advice in the PPG<sup>7</sup>.

2.14 Whilst the representation on the Draft Submission Plan (paragraph 5.4) indicated that the uncapped housing need figure was only 12.8% above the capped requirement at that time, the immediate review of the Plan would provide the effective opportunity to addressing this higher figure. It is for this reason that adoption of the Plan as currently proposed to be modified is considered to be the appropriate short term solution which contributes towards the Government objective of boosting the supply of housing (NPPF paragraph 60), albeit that this is endorsement by CHD is subject to an immediate review which fully reflects this thrust of national policy.

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<sup>6</sup> See paragraphs 5.1 to 5.6 of the representation to the Draft Submission Plan which indicated that the uncapped housing need was 765dpa, compared to the capped figure of 678dpa.

<sup>7</sup> See second paragraph in “Why is a cap applied?” (ID ref 2a-007-20190220) in “Housing and Development Needs Assessment” section.

- 2.15 Although paragraph 5.3 of the representation referred to the then latest median workplace affordability ratio as 13.27 (published 25<sup>th</sup> March 2021), further updates have since been issued. The most recent figure was released on 25<sup>th</sup> March 2024, indicating that the ratio for Tunbridge Wells Borough is now 12.57. The uncapped figure associated with the same average household growth to determine Local Housing Need (2020-30<sup>8</sup>) would now be 743.7, taking account of the ratio released on 25<sup>th</sup> March 2024. This is only a 10% increase above that within the Submitted Local Plan (as Proposed to be Modified). Taking advice of the methodology for determining Local Housing Need, given that the uncapped figure is within a 40% uplift of that of the Modified Local Plan, this would be the effective target for the imminent review.
- 2.16 As indicated, confirming the Plan as Modified whilst failing to provide for the obligation 15 years post adoption required by NPPF paragraph 22, nevertheless provides the earliest opportunity for boosting housing supply in the short term (NPPF paragraph 60) and also meeting the uncapped housing needs as envisaged by national policy.
- 2.17 As indicated, CHD consider the envisaged approach is appropriate in these circumstances, albeit as explained in the response to question 2 in this issue, it is essential that further safeguards are included to commit the Council to a timely review thereby fully according with the objective of significantly boosting the supply of housing. This is elaborated further in the response to Question 2 below.

**Q2. How would the Council's intended early review of the Plan be controlled? What would be the implications (if any) if an update to the Plan was either significantly delayed or not prepared at all?**

- 2.18 The representations to the Main Modifications (PS\_063) provided CHD initial views on how a commitment to an early review can be obligated in the Local Plan, through reference to the approach advocated by the Inspector who is examining Barnet's Local Plan.

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<sup>8</sup> See the Council's Housing Needs Topic Paper (CD3.18) as referenced in paragraphs 5.3 & 5.4 of the representation. The average household growth was 484.3.



- 2.19 The London Borough of Barnet from 7<sup>th</sup> May until 18<sup>th</sup> June 2024 is consulting upon Main Modifications to their Plan. A copy of the proposed Main Modification committing that authority to an early review of their Local Plan, consistent with the interim conclusions of their Inspector referenced in the representation of CHD is included as Appendix 1 to this statement.
- 2.20 CDH’s representation to the Main Modifications outlined an initial refinement to the Modification proposed by the Tunbridge Wells Borough Council (Main Modification SLP Mod 3 (PS\_063)). Whilst this provides an element of control, given the Inspector’s specific question to which we respond, it is considered that the Proposed Main Modification (PS\_063) should be refined to provide greater certainty for the obligations to the Council and the consequences for not achieving this. To provide this, CDH reference the approach embedded in the adopted Part 1 Vale of White Horse Local Plan regarding that authority’s commitment to prepare a Plan addressing its share of unmet housing need arising in the City of Oxford<sup>9</sup>.
- 2.21 As indicated in Appendix 2, Core Policy 2 of the Vale of White Horse’s Part 1 Local Plan was clear on the timeline and implications for the strategy if there was a failure to prepare a further plan in a timely manner. Taking account of the approaches in Barnet and the Vale of White Horse, it is advocated that Proposed Main Modification SLP Mod 3 is amended so that the new upper case text is inserted at the end of Policy STR1. This would read (further additions shown underlined and omissions shown struck-through):

**“FOLLOWING ADOPTION, THE COUNCIL WILL UNDERTAKE AN IMMEDIATE ~~EARLY~~ REVIEW OF THE LOCAL PLAN COMMENCING WITH THE PREPARATION OF A NEW LOCAL DEVELOPMENT SCHEME (OR OTHER DOCUMENT OF EQUIVALENT STATUS) WITHIN 6 MONTHS OF THE PLAN’S ADOPTION. THIS, WHICH WILL INCLUDE A COMMITMENT TO FURTHER INVESTIGATION OF WAYS OF MEETING IDENTIFIED HOUSING NEEDS FOR THE PERIOD POST 2034 UNTIL AT LEAST 2042.**

**A NEW LOCAL PLAN (OR PART 2 LOCAL PLAN) MEETING THE FULL IDENTIFIED HOUSING NEEDS (INCLUDING THOSE POST 2034 TO AT LEAST 2042) WILL BE SUBMITTED FOR EXAMINATION WITHIN 2 YEARS OF THE PLAN’S ADOPTION. FROM 2 YEARS AFTER ADOPTION OF THIS LOCAL PLAN UNTIL THE COUNCIL HAS ADOPTED THE SUBSEQUENT LOCAL PLAN THAT FULLY RESOLVES THE FULL HOUSING NEEDS (INCLUDING POST 2034), THE BOROUGH’S HOUSING REQUIREMENT NEED WILL BE THE UNCAPPED LOCAL HOUSING NEED CALCULATED CONSISTENT WITH NATIONAL GUIDANCE.**

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<sup>9</sup> Extract of Core Policy 2 of the Vale of White Horse District Local Plan: Part 1 included as Appendix 2 of this statement.

**FAILURE TO ADDRESS THE IDENTIFIED HOUSING NEEDS POST 2034 THROUGH A NEW LOCAL PLAN WITHIN 2 YEARS OF ADOPTION OF THIS PLAN WILL MEAN THE MOST IMPORTANT POLICIES ASSOCIATED WITH THE HOUSING REQUIREMENT AND PLANNING DESIGNATIONS RESTRICTING DEVELOPMENT BEYOND BUILT-UP AREAS ARE OUT OF DATE TRIGGERING THE APPLICATION OF NPPF PARAGRAPH 11D. SUCH A FAILURE COULD REPRESENT EXCEPTIONAL CIRCUMSTANCES IN THE CONTEXT OF GREEN BELT AND AONB.”**

- 2.22 This further revision to policy STR1 would ensure the commitment to an early review is included as part of the Development Plan, alongside the implications for any failure to prepare and adopt the review in a timely manner.

**Q3: The Development Strategy Topic Paper Addendum states that “...other distribution options that may provide the full 15 years’ housing land supply were assessed as part of the formulation of the Pre-Submission Local Plan through rigorous consideration. However, there was not an obvious alternative strategy to the one proposed at the SLP stage.”<sup>10</sup> What is the justification, therefore, of seeking an early review to the Plan if options without Tudeley Village have already been considered and discounted?**

- 2.23 As indicated in the response above, the Council discounted options for development within the AONB and Green Belt in the context of housing schemes<sup>11</sup>, whereas this did not apply to employment (as illustrated by the allocation of land off Kingstanding Way) given that there were opportunities to address this outside of these designations i.e at Paddock Wood. The approach of the Council is therefore inconsistent given it has treated employment land differently to sites for housing<sup>12</sup>.

- 2.24 It is therefore clear that there are options for delivering the necessary growth in the borough which have unjustifiably and prematurely been discounted. The review of the plan to both address the uncapped local housing need together with the requirements post 2034 can therefore explore all options. This review of all options can take account of the implementation of this plan and how it requires a refined assessment. An illustration of this would be Castle Hill to the north of Royal Tunbridge Wells which would need to be reviewed in the context of the committed major employment development on land off Kingstanding

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<sup>10</sup> See paragraph 10.1 of PS\_054.

<sup>11</sup> See Paragraph 2.12 of PS\_054.

<sup>12</sup> See paragraphs 10.36-10.41 of the Representations to the Draft Submission Plan.

Way. This is about to be implemented further altering the visual and physical context of the Castle Hill site.

2.25 The current evidence base does not take this into account and once this has occurred the conclusions on the suitability of this location may well change. There will be other options for growth which could likewise be confirmed as suitable, taking account of the implementation of the committed schemes in this Plan.

2.26 The justification for seeking an early review is detailed in the response to question 1 of this issue.

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# Table of Proposed Main Modifications – May 2024

## Policies

### SCHEDULE OF PROPOSED MAIN MODIFICATIONS TO SUBMISSION DRAFT BARNET LOCAL PLAN

This schedule contains all proposed main modifications to Barnet's Local Plan that was submitted for examination on November 26<sup>th</sup> 2021.

#### Modifications

Ref	Chapter / Policy Number /	Proposed Modification Strikethrough text = text proposed for removal compared to submission version <u>Underline text</u> = new text proposed for addition compared to submission version	Reason for Modification
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MM 4	Chapter 1 – Introduction  Paras 1.7.1 to 1.7.3	<p><b><u>1.7-Boundary-<del>Early Update to Strategic Policies and Process for Review of Non-Strategic Policies</del></u></b></p> <p><del>1.7.1 Following an electoral review by the Local Government Boundary Commission the Boroughs ward boundaries will change in May 2022. The changes are set out in the London Borough of Barnet (Electoral Changes) Order 2020. Council will ensure that these are reflected in the Local Plan. The NPPF states that strategic policies should look ahead over a minimum 15 year period from adoption. NPPF highlights that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan and should take into account changing circumstances affecting the area, or any relevant changes in national policy.</del></p> <p><u>1.7.2 Barnet's Local Plan covers a period up to 2036. It therefore does not provide a full 15-year period from the date of adoption. In order to address this the Council will facilitate the early review of the Local Plan through formal publication of a new Local Development Scheme. This will set out a new timetable for an update of the strategic policies of the Local Plan, looking ahead over a 20 year timeframe and ensuring that the Plan covers a minimum 15-year period from the projected date of adoption. The review of non-strategic policies and the scope of updates to strategic policies will be informed by the contents of the Local Plan Monitoring Framework set out at Table 21. This provides for a satisfactory and practicable basis for annually monitoring the effectiveness of the Local Plan.</u></p> <p><u>1.7.3 The Council will formally publish the new Local Development Scheme within a year of the date of adoption of this Plan.</u></p>	<p>Outlines the Council's commitment to an early review of the Plan and the associated approach to publication of a new Local Development Scheme to facilitate this within a year of the adoption of the Plan.</p>

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MM 15	Chapter 4 – Growth & Spatial Strategy  Policy GSS02 And consequential changes to supporting text Paras 4.9.2, 4.9.3, 4.9.4, 4.10.1 to 4.10.4, 4.14.8.	<p><b>POLICY GSS02 Brent Cross Growth Area</b></p> <p>The Council supports comprehensive regeneration of Brent Cross Growth Area to deliver a new Metropolitan Town Centre providing a range of uses including new homes, <del>a new commercial uses office quarter</del>, an expanded retail offer, destination leisure and entertainment, cultural and arts facilities, restaurants and hotels supported by an extensive programme of infrastructure investment over the Plan period.</p> <p><u>The Council will support development proposals that contribute to the comprehensive regeneration of the Growth Area by optimising the use of land and site capacity through a design-led approach (London Plan Policy D3).</u></p> <p><b><u>A. Development Proposals</u></b> Development proposals within the Growth Area <u>shall, insofar as they are relevant to the proposal must:</u></p> <ol style="list-style-type: none"> <li>Demonstrate how they assist in achieving and not undermining comprehensive development of the area;</li> <li>Contribute towards the creation of a Metropolitan Town Centre;</li> <li>Support the provision of a minimum of <del>9,500</del> <u>7,420</u> new homes, <u>with provision for uplift through the design-led approach,</u> including a mix of tenures and types of housing <u>including Build to Rent;</u></li> <li>Protect and where possible improve the amenities of existing and new residents;</li> <li>Create a high quality, safe and attractive environment accessible to all;</li> <li>Create an integrated network based on the Healthy Streets approach of pedestrian and cycle routes through high quality public realm and open spaces to meet leisure, access, urban design and ecological needs;</li> <li>Provide sufficient community infrastructure, including new and expanded schools and primary healthcare capacity;</li> <li><u>Contribute to ensure</u> the restoration and enhancement of the River Brent and its corridor to provide both public amenity and biodiversity benefits to the area <u>alongside providing</u></li> </ol>	<p>Clarification of range of uses that will be supported in the new Metropolitan Town Centre, with support for development proposals contributing to comprehensive regeneration of Brent Cross Growth Area through optimising use of land and site capacity via design-led approach.</p> <p>Reduction of provision to a minimum of 7,420 new homes with design-led approach to support any uplift.</p> <p>Addition of support for Build to Rent as part of tenure mix and types of housing.</p> <p>Clarification to align with NPPF that developments required to contribute to restoration and enhancement of River Brent and its corridor, alongside providing connections between Welsh Harp and West Hendon Playing Fields.</p> <p>Deletion of requirement to deliver new waste management facility as intended location for replacement is within Brent Cross West (Staples Corner) Growth Area.</p> <p>Clarification of approach to meanwhile uses.</p> <p>Clarification on new commercial uses around new station.</p> <p>Additions to reflect changes to Use Classes Order for main town centre</p>
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		<p><del>connections and to fully connect</del> to the Welsh Harp (Brent Reservoir) and West Hendon Playing Fields.</p> <p><del>The Brent Cross Growth Area will also deliver a new waste management facility to replace the existing Hendon Waste Transfer Station operated on behalf of the North London Waste Authority.</del></p> <p><u>The Council will support meanwhile uses for temporary periods will be permitted</u> where it can be demonstrated that they support the comprehensive development of the area <u>and/or do not impede the implementation of the planned long term use of these sites.</u></p> <p><b>B. New Metropolitan Town Centre</b></p> <p>The new Metropolitan Town Centre, extending north and south of the <u>A406</u> North Circular Road, will provide a range of uses, including retail, leisure and entertainment, cultural and arts facilities, restaurants, hotels, homes, business units, community facilities all within new neighbourhoods designed within a public realm that is green, safe and welcoming to all.</p> <p><del>A</del><u>New commercial uses</u> quarter focussed around the new Brent Cross West rail station will provide <u>up to 395,297m<sup>2</sup> 000m<sup>2</sup></u> of office development for over 20,000 new jobs. <del>This Brent Cross Town will</del> deliver the largest area of new space for economic growth in Barnet. There will also be support for creation of spaces for small and start-up businesses.</p> <p>Brent Cross Shopping Centre will be enhanced and integrated as part of the new Metropolitan Town Centre and will deliver a range of leisure and other <u>main town centre uses to ensure that it acts as a regional destination and contributes to a vibrant and viable night-time economy. The shopping centre (including those contributing to the night-time economy) and a mix of residential.</u> <u>Brent Cross North</u> will be connected to a new high street to the south via <del>new pedestrian and vehicular bridges</del> <u>enhanced connections</u> over the North Circular. Development at Brent Cross <u>North Shopping Centre</u> is required to deliver measures to increase access to the town centre by means other than the private car. This should be reflective of up to date mode targets.</p> <p><b>C. Transport Improvements</b></p>	<p>uses and clarify integration of Shopping Centre with new Metropolitan Town Centre (including those contributing to the night-time economy) and a mix of residential.</p> <p>Highlight Brent Cross North requirements for development proposals to enhance connections over North Circular Road and increase access by modes of transport other than the private car.</p> <p>Clarification that transport improvements come forward in accordance with outline permission, or through future permissions, planning conditions or planning obligations.</p> <p>Clarification of requirements for a replacement or remodelled and improved bus station north of the North Circular Road as part of expansion of Brent Cross Shopping Centre, with associated improvements to local bus infrastructure.</p> <p>Clarification that enhanced and multi-modal transport links are sought, including at least one link across North Circular Road and at least one crossing over the railway to Edgware Road.</p> <p>Deletion of requirement for a new rail freight facility to replace existing Strategic Rail Freight Site, as this has already been delivered.</p>
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		<p><del>Development proposals will need to bring forward</del> The following <u>transport improvements are proposed within the Brent Cross Growth Area and will be delivered pursuant to the existing planning permission or through future permissions detailed design, planning conditions and/ or Section 106 agreements planning obligations / legal agreements :</u></p> <ul style="list-style-type: none"> <li>a) <del>Prioritise</del> Pedestrian and cycle routes throughout the new development and improvements to pedestrian and cycle connections and routes beyond the development area;</li> <li>b) <del>Ensure</del> Good access for disabled persons throughout the area with step-free access at Brent Cross Underground and Brent Cross West stations.</li> <li>c) A new rail station <u>and public transport interchange at (Brent Cross West)</u> on Thameslink line supported by a public transport interchange;</li> <li>d) A new <u>replacement or remodelled and improved</u> bus station north of the North Circular Road <u>(in Brent Cross North)</u> as part of the expansion of Brent Cross Shopping Centre, with associated improvements to the local bus infrastructure;</li> <li>e) Connections and/ or improvements to the strategic road network, that are supported by Transport for London in relation to the TLRN (TfL Road Network), and <u>National Highways England</u> in relation to the M1 motorway, based on up to date mode share targets;</li> <li>f) Appropriate <del>new</del> <u>enhanced</u> and multi-modal transport links to and within the development including at least one link across the North Circular Road and at least one crossing over the railway to the Edgware Road; <u>and</u></li> <li>g) Improved <u>pedestrian</u> access across the A41 Hendon Way to link with Brent Cross Underground Station.; <del>and,</del></li> </ul> <p><del>A new rail freight facility to replace the existing Strategic Rail Freight Site.</del></p> <p>The Council <del>will secure contributions from developers towards the retrospective costs of infrastructure delivered in earlier phases of the development. Where appropriate the Council will use CIL to deliver strategically important highways infrastructure. recognises that some</del> <u>infrastructure may need to be funded or provided in advance of later phases of development. To ensure that infrastructure to support development is provided at appropriate times and that all relevant developments make necessary contributions towards the costs of infrastructure across the Brent Cross Growth Area in order to achieve comprehensive development, the Council will work</u></p>	<p>Clarification that requirements for infrastructure funding accord with NPPF and CIL Regulations.</p> <p>Clarification on monitoring progress on the comprehensive regeneration with appropriate milestones for delivery and triggers for action. This includes a commitment to an early review of the Local Plan if necessary and preparation of a SPD as appropriate.</p> <p>Changes to reflect that Brent Cross North and Brent Cross Town remain in different and multiple land ownerships and therefore, that development within Growth Area will be expected to be co-ordinated to ensure that the development of one area does not unnecessarily delay nor fetter another.</p>
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		<p><u>with developers to negotiate planning obligations in the Brent Cross Growth Area on a case by case basis having regard to any cumulative impacts, in line with Government guidance and the tests in the CIL Regulations 2010 (as amended) and/or any equivalent relevant legislation or regulations.</u></p> <p><u>The Council will also consider how the monies collected through CIL are used in the Brent Cross Growth Area as well as, at its discretion, the facility for infrastructure to be provided in kind rather than paying CIL.</u></p> <p><b><u>D. Progress of Brent Cross Regeneration</u></b></p> <p><u>The Local Plan sets out will establish a series of indicators to monitor progress on the regeneration of the Brent Cross Growth Area. These include It will set appropriate milestones for assessing the delivery of the regeneration. and setting out the stages where a review of GSS02 or introduction of a new planning framework may be necessary to further comprehensive redevelopment. The Council is committed to an early review of the Local Plan. It will also review the 2005 Development Framework and introduce a new planning framework Supplementary Planning Document. Early review of the Local Plan together with the new SPD will help to provide more detailed guidance in respect of Local Plan policy for the Brent Cross Growth Area and development sites within.</u></p> <p><u>The Council seeks comprehensive development of the Brent Cross Growth Area. Brent Cross North and Brent Cross Town remain in different (and multiple) land ownerships, and The Council will seek to ensure that development and delivery within the Growth Area of these strategic areas is co-ordinated and that one area does not delay nor fetter another. This entails that the development and delivery of these strategic areas is not delayed or fettered by the other.</u></p>	
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# 1 Introduction

## Core Policy 2: Cooperation on Unmet Housing Need for Oxfordshire

The Council will continue to work under the ‘duty-to-cooperate’ with all other Oxfordshire local authorities on an ongoing basis to address the objectively assessed need for housing across the Oxfordshire housing market area.

As a first step, Vale of White Horse District Council has sought to accommodate the housing need for Vale of White Horse District in full in the Vale of White Horse Local Plan 2031 Part 1. The Council recognises that Oxford City is unlikely to be able to accommodate the whole of its new housing requirement for the 2011-2031 period within its administrative boundary.

In tandem, the Council will continue to work jointly and proactively with all of the other Oxfordshire local authorities and through the Oxfordshire Growth Board to address any unmet housing need. This will include assessing all reasonable spatial options, including the release of brownfield, the potential for new settlements and a full strategic review of the boundaries of the Oxford Green Belt. These issues are not for the Council to consider in isolation.

To ensure Oxford’s unmet need is addressed, the Council will allocate sites to contribute towards Oxford’s unmet housing need within the Local Plan 2031: Part 2, to be submitted to the Secretary of State, within two years of adoption of the Local Plan 2031: Part 1. This will ensure that unmet need is considered and planned for in a timely manner and is tested through a robust plan-making process in accordance with national policy, national guidance, the Strategic Environmental Assessment (SEA), Environmental Assessment of Plans and Programmes Regulations, and the Habitats Regulations Assessment (HRA).

Whilst the Local Plan 2031: Part 2 is in preparation, the Council’s housing requirement will be 20,560. However, if the Part 2 plan is not adopted within two years of the adoption of Local Plan 2031: Part 1, then from that time until the adoption of the Part 2 plan, the Council’s housing requirement will be 20,560 plus the agreed quantum of Oxford’s unmet housing need to be addressed within the Vale of White Horse District.