

Cabinet Report



Report of Head of Planning

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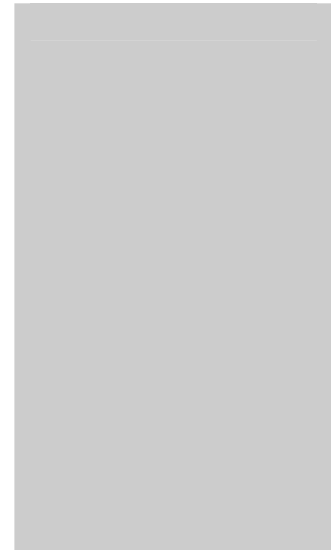
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Draft housing distribution numbers for the larger villages

Recommendation

The draft housing distribution numbers for the larger villages, as set out in Appendix A, is supported as a basis for taking forward neighbourhood plans in advance of the Local Plan: Sites and General Policies Development Plan Document

Purpose of Report

1. To confirm cabinet's support for the draft housing distribution numbers for the larger villages which will inform the preparation of neighbourhood plans.

Corporate Objectives

2. Meeting housing need: bringing forward land at the larger villages to accommodate 1,154 new homes, to help meet our housing growth ambition to 2027, as set out in the South Oxfordshire Core Strategy.
3. Support for communities: supporting local communities who are preparing neighbourhood plans.

4. Building the local economy: supporting suitable proposals for economic growth in neighbourhood plans.

Background

5. The South Oxfordshire Core Strategy sets out in Policy CSH1, together with the accompanying table 7.3, that 1,154 new homes should be built in the larger villages of Benson, Berinsfield, Chalgrove, Cholsey, Chinnor, Crowmarsh Gifford, Goring, Nettlebed, Wheatley, Woodcote and a site at Bayswater Farm. Bayswater Farm is a single site lying outside the Green Belt in a sustainable location on the edge of Oxford.
6. Our next planning document, the [Local Plan: Sites and General Policies](#) will set out how these 1,154 new homes should be divided between the twelve Larger Villages and Bayswater Farm. Specific sites will also be identified in the plan to accommodate this allocation or in a neighbourhood plan where appropriate.
7. We have been working with the parish councils for the larger villages since last September to identify how best to distribute the housing number between the villages. We have sought to take account of local views when making an initial judgement on the capacity of each village to accommodate growth.
8. Our starting point, as required by the core strategy paragraph 7.20, was to split the 1,154 homes across the villages based on each settlement's current size. The village size is based on the number of dwellings shown in the 2011 Census. This proportional split was amended to include at least 500 homes in the Central Oxfordshire area of the district, as required in the core strategy in Table 7.3.
9. Working with the parish councils, we have assessed whether the proportional split needs to be modified to take account of factors such as the individual vision for a village, the Green Belt, the AONB and sustainability factors.
10. In one case at Wheatley the proposed allocation is less than its proportional allocation. This is because the village is entirely within the Green Belt and this limits the amount of land available. Our core strategy Inspector ruled out a localised Green Belt review for Wheatley.
11. We have reached agreement with all the parish councils concerned on a draft distribution of housing numbers. This draft distribution is included at Appendix A.
12. Subsequently we undertook a public consultation on the scope of the Local Plan and this included the draft distribution of housing numbers. This consultation closed on 5 August, however as we were holding exhibitions in the villages to start the site selection process after this date there has been pressure to extend the consultation. We have agreed that it will now end on 6 September. A summary of comments received is attached Appendix B.
13. The distribution of housing numbers will be finalised and agreed by this council when the Local Plan: Sites and General Policies DPD is presented for approval as our submission version to the planning inspectorate for independent examination in 2014.

14. In the meantime we will use the draft distribution number for each larger village in order to carry out more detailed site investigation work. If this reveals that not enough suitable land to accommodate the proposed number of homes can be found at a particular village, then the distribution will need to be modified.
15. At the same time, some communities will wish to press ahead with the preparation of their neighbourhood plans, ahead of this council agreeing the final distribution. They need to have some confidence that they are planning for broadly the right number of new homes.
16. Woodcote Parish Council, for example, is preparing its neighbourhood plan based on the draft distribution. They are likely to submit their plan to us for examination by the beginning of September 2013 and their examination is therefore likely to take place this autumn. Other neighbourhood plans may also be submitted for examination before the Local Plan: Sites and General Policies DPD is submitted or adopted.
17. When a neighbourhood plan goes before an independent Examiner, we will be asked to confirm that the neighbourhood plan proposals are in general conformity with our local strategic policy. In particular, we would expect to be asked whether we have a proposal to ensure that all of the 1,154 homes allocated to the larger villages will be built and that the distribution of the homes between the villages follows the guidance given in the core strategy. If we cannot do this then the neighbourhood plan may not be allowed to progress to the referendum stage.
18. We have undertaken consultation on these draft housing numbers as part of our consultation on the scope of the Local Plan: Sites and General Policies DPD. We have also held a number of exhibitions in the larger villages which will be included the Local Plan as part of our awareness raising work with those communities about potential housing sites. A summary of the responses we have received is set out in Appendix B and our comments on the responses are included in Appendix C.
19. The draft distribution was considered by Scrutiny on 3 September and they resolved to support the recommendation set out above.

Options

20. We have considered the following options
 - a) Cabinet confirm its support now for the proposed distribution for the larger villages.
 - b) Cabinet does not take a view on the distribution until it takes a decision to submit the Local Plan: Sites and General Policies DPD along with the associated impact assessment on neighbourhood plans.
21. Endorsement now will provide communities with greater confidence in using the draft housing distribution numbers for the preparation of neighbourhood plans. To minimise the risk of neighbourhood plans failing the 'general conformity' test,

because the distribution may have to be changed before it is finalised, we will encourage parishes to include contingency sites.

22. Conversely, withholding endorsement of the draft distribution may affect the confidence and willingness of communities to progress with the preparation of neighbourhood plans, for example, to expend effort and resources on community consultation or preparatory technical work. This may significantly delay their progress, and the delivery of housing through their plans.
23. Withholding endorsement also increases the risk that any neighbourhood plan that does proceed to examination may fail, if the Examiner is not confident that the neighbourhood plan will enable local strategic policy for housing delivery to be achieved.
24. We need to assure any Examiner that the neighbourhood planning groups and the council are working together on this issue and have an agreed approach as set out in Appendix A.

Financial Implications

25. There are no significant financial implications with this decision that cannot be accommodated within budget.

Legal Implications

26. There are no significant legal implications with this decision.

Risks

27. A decision now could raise expectations that the draft distribution is more certain than we can in fact guarantee at this stage. Later changes could lead to dissatisfaction with the process and create tensions with parish councils, local communities and landowners. We can manage this risk by providing clear information to district councillors and parishes about the weight and status of the draft distribution.

Other implications

28. There are no other significant implications with this decision.

Conclusion

29. The draft distribution follows the guidance given by the Inspector in the core strategy and has the support of the parish councils for each of the larger villages. Endorsement now by Cabinet of the draft housing distribution numbers will provide a formal position that can be reported to an Examiner scrutinising a neighbourhood plan. This should satisfy the Examiner that the neighbourhood plan is in general conformity with our local strategic policy.

Background Papers

- South Oxfordshire Core Strategy adopted December 2012

Appendix A

Draft housing distribution for the larger villages

Location	Proposed number of homes
Central Oxfordshire area	
Benson	125
Berinsfield	109
Cholsey	128
Crowmarsh Gifford	48
Wheatley	50
Bayswater Farm	40
Sub total	500
Rest of District area	
Chalgrove	80
Chinnor	159
Goring	105
Nettlebed	20
Sonning Common	138
Watlington	79
Woodcote	73
Sub total	654
GRAND TOTAL	1154

Appendix B

Summary of consultation responses on the proposed distribution of the 1154 homes to the larger villages.

This summary includes consultation responses received up to 12 September 2013. The consultation was extended and ended on Friday 6 September 2013.

The summary uses information from two sources; that taken directly from formal responses to the consultation and that from exercises held at consultation events to gain views on housing sites in the larger villages. The information is clearly separated out to demonstrate these two sources.

Headline information from formal consultation responses

Total number of responses received (13.08.13):	267
Total number of respondents (13.08.13):	235

Breakdown of responses to the following question, please note that not all respondents replied to this question:

Do you agree with the proposed housing numbers for each of the 12 larger villages? Please note that each village must accommodate a share of 1,154 new homes		
	Count	Percentage
Yes	31	21.68
No	112	78.32
Total responding	143	100

Points raised by those agreeing with the proposed housing distribution

- Numbers seem reasonable in terms of the size of the settlements
- Will help with sustainability of the communities of those settlement, particularly if affordable housing is allowed
- Agree with the number but need to tackle traffic and infrastructure concerns
- Agree with the principle of locating housing in the larger villages, but constraints need to be better factored in to the approach taken
- Agree with the numbers in principle, but they should not be seen as a limit when development is sustainable. This would be in keeping with the NPPF
- Agree, but homes should not be built in AONB, flood plain or edge of settlements.

Points raised by those disagreeing with the proposed housing distribution

1. Allocations should be based on space available at settlements and proximity to existing services and facilities.
2. Allocations should be divided more evenly between the 12 larger villages
3. Some settlements have a much better range of facilities and development should be focussed there and their allocation increased.
4. The network of settlements should be changed.
5. Should adopt an approach of a greater spread of permitted smaller sites based on key criteria other than location
6. Some settlements have fewer constraints and development should be focussed there and their allocation increased.

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7. Some settlements have already seen large scale development and this should be reflected in their allocation.
8. Windfall sites should be taken into account to reduce the allocations.
9. The allocations should factor in proximity to places of work.
10. If the allocation has been adjusted for some villages due to green belt considerations, the same approach should be used for AONB villages.
11. Should be focussing on bringing into use houses that have long been empty and other brownfield sites.
12. Traffic issues in various settlements that the new housing will exacerbate.
13. The allocations will result in the loss of good agricultural farmland.
14. No logic presented on the reasons for the split. It seems to have been done only on a simplistic mathematical basis. The data and methodology need to be clearly presented and explained and sustainability factors justified.
15. Will the houses in the different settlements actually be for local people in those settlements?
16. Strong concern regarding the lack of infrastructure (schools, healthcare provision etc.) in villages and how they will cope with more housing.
17. Car parking provision for new housing allocations is a concern
18. The Strategic Housing Market Availability Assessment may give a higher objectively assessed need, which will need to be accommodated in the plan and trigger an early review of the core strategy. Agreement on any housing figures is premature.
19. The figure of 500 homes in the Central Oxfordshire region was not intended by the Inspector as a ceiling, which the council has used it as. Therefore the split is incorrect.
20. The housing numbers should be considered as a minimum not a maximum.
21. Too many houses in the larger villages already. Additional allocations are not protecting their rural character. Villages are turning into towns.
22. The 1154 housing figure is incorrect and should be challenged.
23. The council's population data shows no need to build within the rest of the district area.
24. Villages cannot cope with this level of development. It should be focussed in the larger towns or have a primary focus on Didcot.
25. Absolute numbers will impact the development management stage, driving the design of development rather than a more flexible policy approach.
26. Why is not a decision taken to grow the smaller villages instead or in association with the larger villages?
27. There needs to be further consultation on this matter
28. There is no reference that the distribution takes into consideration the housing needs of either the district or the individual village. The latter being referenced in para 7:20 of the core strategy
29. Housing need should be the starting point, when looking at the housing distribution
30. Council refer to the fact that the distribution approach 'has not identified any need to modify the allocations.' This suggests that the Council's approach may have already pre-determined the matter of housing distribution across the larger villages, before evidence is available to be reviewed and commented upon.

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31. Query whether the starting point of the numbers of existing dwellings in any village has any real planning significance
32. No evidence has been supplied of alternative options to the split, a key test of soundness
33. There is no in-built contingency demonstrated

Points raised on the housing distribution in the consultation exercises

Berinsfield (32 attending event) **Crowmarsh** (36 attending event), **Cholsey** (105 attending event)

No specific comments on the numbers

Chinnor (183 attending exhibition event)

- Too many homes will make Chinnor like a town.
- The community size and feel is right as it is, more housing will ruin this.

Chinnor public meeting (490 attending event)

- Greater clarification is needed on the certainty of housing numbers and how they have been calculated.
- Infill numbers should count towards Chinnor's allocation.
- Concern about infrastructure in the village and impact of new development.
- Infrastructure should come before new development takes place.
- Concern that SODC and Chinnor Parish Council are not standing up to developers.
- People want the village to remain a village.
- Should look to build a new village, ideally off junction 7 off the M40 (near Little Milton) where new development would not infringe on existing facilities.
- Allocations should be made in the smaller villages.
- Will infrastructure and facilities be able to accommodate the new residents?
- Allocations should not be made at Chinnor as there is not enough local employment for these new residents.

Nettlebed (47 attending event)

- Leave Nettlebed as it is

Goring (175 attending event)

- Do not believe 100+ homes is appropriate for an AONB village

Watlington (125 attending event)

- Keep Watlington as a village not a town

Wheatley (147 attending event)

- Questions around the scale of the allocation changing the village feel of Wheatley or changing Wheatley into a small town
- Wheatley is big enough already.

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Draft housing distribution numbers for the larger villages

SODC Comments on consultation responses on the proposed distribution of the homes to the larger villages

Ref	Their response	Our comment
1	Allocations should be based on space available at settlements and proximity to existing services and facilities	<p>Our overall strategy, established in the Core Strategy at Policy CSS1, is about having a strong network of settlements (see also Map 4.1, on pg 29). This took account of the level of services and facilities available in different villages and at how, across the district, we could support those places with relatively the best services and facilities, for their benefit and for the benefit of other smaller nearby communities.</p> <p>We are taking account of the space available. Our Strategic Housing Land Availability Assessment has identified those sites that might be suitable and we will be doing further work to refine our understanding of each site, to establish whether there is enough suitable land to accommodate the allocation proposed for a village. If we find that there is not enough land then the balance remaining will be distributed to other villages.</p>
2	Some settlements have a much better range of facilities and development should be focussed there and their allocation increased	<p>In accordance with our overall strategy of building a strong network of settlements, the Core Strategy established at p. 7.20 the basic approach to be taken to the distribution of the 1,154 homes between the larger villages. This recognised that between the larger villages there are considerable differences of size and the range of services and facilities available. This was accepted because what the overall strategy established was an approach that sought to ensure that each part of the district had – what is for it – a larger village whose services and facilities would be supported, both for its benefit and that of other smaller nearby communities.</p>
3	Some settlements have fewer constraints and development should be focussed there and their allocation increased	<p>The approach to the distribution, established in the core strategy at p. 7.20, recognises that some villages are subject to constraints that may mean it is not possible for them to accommodate the proposed allocation, in which case the balance remaining will be distributed to other villages. This will only arise after a thorough and detailed assessment of the potential sites identified in our Strategic Housing Land Availability Assessment.</p>
4	The allocation should be	See comment on response '3' above

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Ref	Their response	Our comment
	divided more evenly between the 12 larger villages	
5	The network of settlements should be changed	<p>The classification of settlements (into larger and smaller villages) and which should form part of the network of larger villages, was the subject of thorough scrutiny and discussion as part of the independent examination into the core strategy, which concluded it was correct. This debate has therefore already taken place and the network is established in the core strategy. Further discussion and challenge now cannot change that.</p> <p>In accordance with our overall strategy of building a strong network of settlements, the Core Strategy established at p. 7.20 the basic approach to be taken to the distribution of the 1,154 homes between the larger villages. This recognised that between the larger villages there are considerable differences of size and the range of services and facilities available. This was accepted because what the overall strategy established was an approach that sought to ensure that each part of the district had – what is for it – a larger village whose services and facilities would be supported, both for its benefit and that of other smaller nearby communities</p>
6	Should adopt an approach of a greater spread of permitted smaller sites based on key criteria other than location	<p>The allocation of sites at each settlement is still to be determined. Consideration will need to be given to the respective merits and challenges of delivering all the allocated homes at one location or spread across a number of sites around a village. This will need have regard to the specifics of each villages and its sites.</p> <p>To spread the allocation more broadly on small sites across the district would be contrary to the overall settlement strategy.</p>
7	Some settlements have already seen large scale development and this should be reflected in their allocation	<p>The approach to the distribution, established in the core strategy at p. 7.20, was the subject of scrutiny and discussion as part of the independent examination into the core strategy. This recognised that some larger villages, notably Cholsey and Chinnor, had recently accommodated significant new housing development. The conclusion remained that a proportional approach was the most appropriate to support our overall strategy of creating a network of strong settlements.</p>

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Ref	Their response	Our comment
8	Windfall sites should be taken into account to reduce the allocations	Windfall sites have already been taken into account as part of our forward supply of new homes; they provide our contingency should our allocated sites not deliver as expected. We cannot therefore 'count them twice' and use them to reduce our allocations; nor would this be allowed under government policy.
9	The allocations should factor in proximity to places of work	It would be challenging to do this at the level of individual settlements because travel to work patterns can vary so much geographically and over time. At a wider level, the distribution established in the core strategy at table 7.3 does recognise the potential for settlements in the west of the district to contribute to supporting the economic growth around Science Vale UK and Oxford City, and accordingly established a minimum level of allocation that must be made in this area (500 homes). We would not wish to add further to this because it would begin to detract from our overall strategy of having a network of strong settlements across the district.
10	If the allocation has been adjusted for some villages due to green belt considerations, the same approach should be used for AONB villages	<p>Green Belt and Areas of Outstanding Natural Beauty are subject to different policies, both nationally and locally. They are designated for different reasons and they 'serve' different purposes, and therefore the criteria to be applied when making decisions about development are also different. The criteria for Green Belt are more restrictive.</p> <p>We will of course be looking very carefully about the impact development may have on our Areas of Outstanding Natural Beauty, and we are commissioning landscape assessments to help with this.</p>
11	Should be focussing on bringing into use houses that have long been empty and other brownfield sites	<p>We have no major brownfield sites and most of our new homes will therefore come forward on Greenfield sites. Where there are suitable brownfield sites then we will consider them; though we need to be cautious not to lose too many employment sites; we are looking for new employment sites as well as new housing sites.</p> <p>Nor do I think we have many empty homes. We have some that have been empty for an unusually long period. This is really a matter that Housing deal with, rather than Planning, but I would remind the Committee that the council does offer help and</p>

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Ref	Their response	Our comment
		<p>incentives to bring empty homes into use: we provide a Rent Deposit Guarantee Scheme and; we apply a 50% premium to properties that have been empty for more than two years. I would not expect that reducing the number of empty homes in the district would have much impact on or overall demand for housing.</p>
12	<p>Traffic issues in various settlements that the new housing will exacerbate</p>	<p>We will be looking at the impact of the proposed housing allocations village by village and site by site.</p> <p>We are a rural district and we recognise that alongside any measures we can secure to improve public transport or encourage other modes of travel, future residents will also want to exercise their right to movement by car, just as existing residents do.</p> <p>There will of course therefore be additional vehicle movements. We shall look at where we can manage those to reduce their impact. In some cases if the impact would still be severe when taken together with other impacts then we may conclude a site or a level of growth for that village is not acceptable.</p> <p>These are detailed matters that we are commissioning further work to investigate and which shall be the subject of further consultation. Remember, the distribution before you at the moment is a draft.</p>
13	<p>The allocations will result in the loss of good agricultural farmland</p>	<p>This is one of the many factors we consider. We will seek to avoid the loss of best agricultural land. There may still be some cases where, after consideration of all the factors, some loss is justified. These losses will not be great as a proportion of all agricultural land available.</p>
14	<p>No logic presented on the reasons for the split. It seems to have been done only on a simplistic mathematical basis. The data and methodology need to be clearly presented and explained and sustainability factors justified</p>	<p>The split is based on supporting our overall strategy of having a strong network of settlements across the district, and was the subject of scrutiny and discussion as part of the independent examination into the core strategy. The approach we must follow is now established at p. 7.20 of the core strategy.</p> <p>In future consultations we will look at how we can communicate more effectively the points raised.</p>
15	<p>Will the houses in the different settlements</p>	<p>Most of the homes will be available on the open market, and some will be bought by local people.</p>

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Ref	Their response	Our comment
	actually be for local people in those settlements	Some of the affordable homes may also go to local people, depending on their circumstances.
16	Strong concern regarding the lack of infrastructure (schools, healthcare provision etc.) in villages and how they will cope with more housing	<p>We will be looking at the impact of the proposed housing allocations village by village and site by site. As part the process we are liaising with the County Council, the Clinical Commissioning Groups, Thames Water and others, and also of course seeking information from parish councils and local people.</p> <p>We expect therefore to be well aware of where the pressures lie and of what impact new housing will have. In some cases it may place stress on local infrastructure and we will need to look at whether and how we can then manage that. In some case it may help to bolster and sustain a service or facility, or create the opportunity for improvement.</p>
17	Car parking provision for new housing allocations is a concern	New development will be assessed against the County's standards, which recognise that in our largely rural district there is a greater reliance on cars and therefore a need to make sensible provision for their parking within a well designed scheme.
18	The Strategic Housing Market Assessment may give a higher objectively assessed need, which will need to be accommodated in the plan and trigger an early review of the core strategy. Agreement on any housing figures is premature	<p>We do not know yet what the Assessment will find and this is not the place to start speculating on that.</p> <p>The agreement we are seeking is not to the total amount of housing to be provided, which is something the Strategic Housing Market Assessment can influence. Instead, we are seeking agreement to how the number agreed in the core strategy is to be distributed; and of course, for now only on a draft basis.</p>
19	The figure of 500 homes in the Central Oxfordshire region was not intended by the Inspector as a ceiling, which the council has used it as. Therefore the split is incorrect	<p>This appears to be a misunderstanding, because the figures are minima not maxima. Once individual sites have been designed in detail we may see the numbers rise slightly, though probably not by very much.</p> <p>Nonetheless, to ensure we deliver our overall strategy of a strong network of settlements we would not look to reduce the allocations in the east of the district should those in the west go up.</p>
20	The housing numbers should be considered as a minimum not a maximum	
21	Too many houses in the larger villages already.	I don't see that change happening as a result of these proposals. We will need to work hard to

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Ref	Their response	Our comment
	Additional allocations are not protecting their rural character. Villages are turning into towns	ensure the new developments are integrated sensitively into their locations and into the existing communities. All the villages have their own distinct rural character and these are very strong and will be able to accommodate new growth of the scale presented at Appendix A. This new development will help to sustain the services and facilities that have, and in most cases still do, provide the heart to these communities.
22	The 1154 housing figure is incorrect and should be challenged	The figure was the subject of thorough scrutiny and discussion as part of the independent examination into the core strategy, which concluded it was correct. This debate has therefore already taken place and the figure is established in the core strategy. Further discussion and challenge now cannot change that.
23	The council's population data shows no need to build within the rest of the district area	Population data is not the sole determinant of our housing target. The Strategic Housing Market Assessment will set our new objectively assessed level of need. It takes account of population data, and a wide range of other factors. Similar data underpins our existing targets in our adopted core strategy.
24	Villages cannot cope with this level of development. It should be focussed in the larger towns or have a primary focus on Didcot	The majority of new housing over the plan period (2012-2027) will take place at Didcot and in the towns. Only a proportion is allocated to the larger villages. The allocation that has been made, in the core strategy, was done to support our overall strategy of having a strong network of settlements across the district.
25	Some smaller villages should accommodate some of the housing	<p>Small scale development will continue to take place in the smaller villages, in accordance with policy CSR1 of the core strategy. Collectively these are an important part of our overall supply.</p> <p>Given the level of services and facilities available in the smaller villages it would not have been appropriate to make major housing allocations to them. Nor would this have been in accordance with our overall strategy to have a strong network of settlements, which to be successful requires development to be focussed on the larger villages.</p> <p>The core strategy, at table 7.3 therefore established which settlements are to be accommodate major new housing sites, and this is what we must now work with.</p>
26	Absolute numbers will impact the development	The allocation to the larger villages is set as a minimum figure by the core strategy (see table

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Ref	Their response	Our comment
	management stage, driving the design of development rather than a more flexible policy approach	<p>7.3). In our Local Plan: Sites and General Policies document we will need to demonstrate to the independent inspector, who will be appointed to examine it, that we can deliver that number of homes (1,154) across the larger villages.</p> <p>The allocations to the larger villages are also minimum numbers and are not 'absolute'. In practice we do not expect the final numbers to be significantly higher, if at all. We will be gathering information on individual sites, so that we can be confident they can deliver at least the minimum number, in a way that can satisfy a range of criteria.</p> <p>Achieving good design will be a factor that influences the final number of homes that can be delivered.</p>
27	Why is not a decision taken to grow the smaller villages instead of or in association with the larger villages	See comment on response '22', above
28	There needs to be further consultation on this matter	There will be further consultation, planned for early in 2014, on the emerging plan before it is presented to cabinet and council to approve it for submission for independent examination.
29	There is no reference that the distribution takes into consideration the housing needs of either the district or the individual village. The latter being referenced in para 7:20 of the core strategy	The core strategy explains in Chapter 7 'Delivering new homes' how the housing number for the whole district has been derived and how it has been split between the towns and larger villages. In the larger villages our strategy is to provide a strong network of settlements throughout the district. This strategy was supported by the core strategy inspector.
30	Housing need should be the starting point, when looking at the housing distribution	The new homes are anticipated to help meet housing need across the district as well as provide a network of sustainable settlements to help provide a range of local services for all residents. We are therefore not looking to just meet the needs of the individual larger villages.
31	Council refer to the fact that the distribution approach 'has not identified any need to modify the allocations.' This suggests that the Council's approach may have already pre-	Our core strategy inspector specified in paragraph 7:20 of the core strategy that the starting point for distributing the housing should be proportionality in relation to the existing number of dwellings in each village. This consultation was seeking views on whether there are any special circumstances that justify departing from this approach.

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Ref	Their response	Our comment
	determined the matter of housing distribution across the larger villages, before evidence is available to be reviewed and commented upon.	
32	Query whether the starting point of the numbers of existing dwellings in any village has any real planning significance	See answer to question 31
33	No evidence has been supplied of alternative options to the split, a key test of soundness	See answer to question 31. We have only identified one case where we think the distribution should be varied. This is the presence of the Green Belt at Wheatley.
34	There is no in-built contingency demonstrated	See the answer to question 8

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