

## Comment

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<b>Address</b>	c/o Agent c/o Agent c/o Agent
<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Taylor Wimpey Uk Ltd and Persimmon Homes Limited ( )
<b>Comment ID</b>	LPPub1059
<b>Response Date</b>	19/12/14 12:06
<b>Consultation Point</b>	Core Policy 13: The Oxford Green Belt ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	Yes
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	N/A

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support**

**the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

Whilst **Persimmon Homes** and **Taylor Wimpey UK Ltd** do not object to the principle of Green Belt review and the identification of sites for development in this area, there is concern that all proposals in this area have not been sufficiently justified, given the overall spatial strategy which seeks to focus sustainable new development in the Science Vale UK area (predominantly the South East Vale area, which is outside of the Green Belt) and as suitable and available development sites exist in these locations (outside of the Green Belt). Where there is no clear sustainability benefit and suitable sites exist elsewhere the national policy of *'exceptional circumstances'* is unlikely to be met.

The Green Belt review which has been proposed by the Council creates significant areas of *'white land'* around settlements within the Oxford Green Belt, and in the case of Botley (see further comments below and elsewhere) there is no Development Boundary proposed to control development on the edge of this settlement (a Local Service Centre in the **Core Policy 3** settlement hierarchy).

Whilst there is no objection in itself for the plan to create areas of *'white land'*, **Core Policy 13** (nor other parts of the Draft Plan) does not make clear the extent and purpose of this land and how it will be treated in planning policy terms. This is relevant in the context of demonstrating the exceptional circumstances that justify changes to the Green Belt, and where suitable alternatives for development exist in non-Green Belt locations. This requirement relates specifically to **Paragraph 85** of the Framework and the requirements, when undertaking Green Belt review and identifying *'safeguarded land'*, to:

*'- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*  
*- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;'*

As drafted, **Core Policy 13** is not effective and consistent with national policy.

A fundamental issue to be addressed in relation to the Green Belt relates to Botley, which as a Local Service Centre should be identified by a Development Boundary on the relevant proposed Proposals Map, however this is not shown (on the basis that development around Botley is tightly constrained by the Green Belt boundary *'footnote 34, page 36'*); however, alterations to the Green Belt boundary and the creation of significant areas of *'white land'* are being proposed. This inconsistency needs to be addressed to prevent unrestricted development on these areas and ensure the effectiveness and soundness of the plan.

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

As above - approach to safeguarded land (white land) should be clarified in plan, as well as use of Development Boundary at Botley.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?** Yes - I wish to participate at the oral examination

**Please note** *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

**Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

To elaborate on representations and participate in discussions on relevant issues.