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BY E-MAIL ONLY

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Dear Sir/ Madam

**VALE OF WHITE HORSE LOCAL PLAN (PART 2) PUBLICATION VERSION –
REPRESENTATION ON BEHALF OF CEG**

1 INTRODUCTION

- 1.1 This letter of representation (and related Representation Forms) are submitted on behalf of CEG. They confirm the very good progress being made to ensure the timely delivery of development on the Local Plan Part 1 North of Abingdon-on-Thames strategic allocation, and set out the case for the Local Plan Part 2 to allocate additional land for development in the immediate vicinity.
- 1.2 Land to the north of Abingdon is very well placed to assist in meeting the unmet housing needs of Oxford City, is sustainably located, and can make best use of the locally planned infrastructure investment (including the A34 Lodge Hill slips, Lodge Hill Park and Ride, A34 Bus Lane and new local centre and primary school on the North of Abingdon-on-Thames strategic allocation).

2 BACKGROUND

- 2.1 It is clear from the content of the recently adopted Vale of White Horse Local Plan Part 1 that the District Council is committed to addressing local objectively assessed housing needs, including a proportion of the unmet housing needs arising from Oxford City.
- 2.2 CEG and its Project Team worked closely with the District Council to support the Local Plan Part 1 through the Examination process, producing a Delivery Document to give the presiding Local Plan Inspector comfort over the suitability and deliverability of the North of Abingdon-on-Thames strategic allocation.
- 2.3 Following receipt of a positive Inspector's Report, the Council moved quickly to adopt the Local Plan Part 1 in December 2016, and CEG looked to continue to support the Council's housing delivery programme by submitting an outline planning application for development at North Abingdon just a few weeks after the Local Plan was adopted.

- 2.4 The outline planning application was considered at a meeting of the Vale's Planning Committee in July 2017, with Members unanimously agreeing a resolution to grant planning permission subject to the completion of a S.106 legal agreement. The S.106 legal agreement was quickly negotiated, signed and completed, allowing outline planning permission to be issued on 27th October 2017.
- 2.5 The first development land parcels are already on the market, with a view to the first new housing units being delivered on the North of Abingdon-on-Thames strategic allocation in 2019.
- 2.6 CEG are proud of the very good progress made with delivery of the North of Abingdon-on-Thames strategic site, and in moving forward, wishes to maintain its strong and positive working relationship with the District and County Councils, as well as other stakeholders and the local community.

3 LOCAL PLAN PART 1

- 3.1 In addressing the Local Plan Part 2 (Publication Version) it is highly relevant to consider the settlement hierarchy and spatial strategy set out in the Local Plan Part 1.
- 3.2 The Local Plan Part 2 allocations should complement the strategy established in Local Plan Part 1.
- 3.3 The Local Plan Part 1 (Core Policy 3: Settlement Hierarchy) confirms that the Market Towns (including Abingdon) have the ability to support the most sustainable patterns of living within the Vale through their current levels of facilities, services and employment opportunities. Core Policy 3 continues by stating that the *'Market Towns have the greatest long-term potential for development to provide the jobs and homes to help sustain, and where appropriate, enhance their services and facilities to support viable and sustainable communities in a proportionate manner'*.
- 3.4 In Local Plan Part 1, Core Policy 4: Meeting our Housing Needs, allocates land at North of Abingdon-on-Thames for around 800 new homes, with the supporting Site Development Template confirming the need for a range of new facilities and infrastructure to ensure the delivery of sustainable development.
- 3.5 The majority of the land North of Abingdon-on-Thames, and three other allocated sites in the vicinity, were removed from the Green Belt upon adoption of the Local Plan Part 1 (December 2016). At the Local Plan Part 1 Examination, CEG endorsed and supported the area of land to be released from the Green Belt at North of Abingdon-on-Thames, which closely correlated with the extent of the land CEG controlled at that time, through a promotion agreement with the relevant landowners.
- 3.6 It is considered pertinent to this representation that the submission draft version of the Local Plan Part 1 proposed a number of other amendments to the Green Belt boundary in the Vale. The Council proposed these sites for release from the Green Belt, but did not propose allocating the land for development. At the Local Plan Examination hearing sessions, the Council indicated that some of these other sites to be released from the Green Belt might be allocated for development in due course, to help meet part of identified unmet housing need from Oxford City.
- 3.7 Through Main Modifications to the Local Plan, the Council removed the other sites it had intended to remove from the Green Belt, and committed to addressing the to be agreed proportion of Oxford City's unmet housing need through Local Plan Part 2.
- 3.8 The Local Plan Inspector accepted this approach, and reported as follows:

“27. Given the indications that it is possible that it will be concluded that Oxford’s unmet housing needs would most appropriately be provided for in the Vale on land currently designated as Green Belt, adoption of the plan now would potentially mean that its Green Belt boundaries would not remain unaltered for the plan period to 2031. Whilst this is not ideal in the context of the Green Belt’s intended permanence in the long term, the plan as submitted does not seek to pretend that its Green Belt boundaries will necessarily remain unchanged: policy CP2 and the supporting text of policy CP13 refer to the potential for a future, further, review of the Green Belt to provide for unmet housing needs.

- 3.9 The Local Plan Inspector and Council (with reference to Policy CP2 and the supporting text to Policy CP13) clearly accepted that further Green Belt land releases would be both potentially appropriate and acceptable to address housing needs.
- 3.10 Importantly, Core Policy 2 (Local Plan Part 1) makes it clear that is the role of Local Plan Part 1 to address the housing needs of the Vale, and the role of Local Plan Part 2 to allocate sites that will contribute towards meeting Oxford City’s unmet housing needs.
- 3.11 The spatial strategy and related policies in the Local Plan Part 1 are up to date, having been adopted less than a year ago. Land adjacent to the Market Towns still has the ability to support the most sustainable patterns of living, and development adjacent to Abingdon (in particular the north of Abingdon) provides the best opportunity to deliver new housing that is accessible to Oxford; accessible to the facilities and services available within Abingdon; and capable of making th best use of planned infrastructure improvements (including the Lodge Hill slips, Lodge Hill Park and Ride, A34 Bus Lane and new local centre and primary school on the North of Abingdon-on-Thames strategic allocation).

4 LOCAL PLAN PART 2

Purpose – Oxford City’s Unmet Housing Need

- 4.1 As above, as confirmed in the Local Plan Part 1, the principal purpose of the Local Plan Part 2 is to set out policies and locations for the new housing needed to meet the Vale’s proportion of Oxford City’s unmet housing need.
- 4.2 Accordingly, one would expect that the additional allocations in Local Plan Part 2 would be focused on those areas best able to help meet the housing needs of Oxford City. CEG are concerned that this is not the case, and that the District Council have sought to back-track on the approach set out in the recently adopted Local Plan Part 1.
- 4.3 Draft Core Policy 4a and related supporting text (in particular paragraphs 2.12 - 2.22) suggest that Oxford City’s unmet housing need will be addressed through a combination of Local Plan Part 1 allocations and one new Local Plan Part 2 allocation (Dalton Barracks). This approach does not accord with the Local Plan Part 1, and if allowed to progress, will result in far less of a focus on supporting Oxford City’s unmet housing needs than envisaged when the Local Plan Part 1 Inspector reported, and found that Plan to be sound.
- 4.4 Taking a step back, Oxford City has a significant unmet housing need, which the Oxfordshire Growth Board agreed in 2015 equated to some 15,000 units in the period 2011 to 2031. It is of course the case that post 2031, meeting the housing needs of Oxford City will become even more challenging, as the current round of housing allocations have been built-out, and even more difficult decision need to be made.

- 4.5 In September 2016, the Vale of White Horse District Council agreed to accommodate some 2,200 units of the City's unmet housing need. With the ongoing uncertainty associated with the level of unmet need to be accommodated in South Oxfordshire, and the further work to be completed on the Oxford City Local Plan, it is considered essential that the provision of 2,200 units is treated as a minimum figure.
- 4.6 The background to the way in which the Oxford Growth Board arrived at the 2,200 units assigned to the Vale of White Horse District, and accordingly the basis on which the District Council accepted its 'allocation', is highly relevant.
- 4.7 The County Council's Spatial Options Assessment (LUC, 2016) examined 36 strategic site options (or areas of search), eleven within the Vale, against criteria covering a broad range of sustainability issues and objectives. The general conclusion was that sites in close proximity to Oxford performed better, with none of the more distant sites highlighted as being well-linked to Oxford. Within the Vale, sites at Botley and Cumnor were found to have the best links to Oxford, with North of Abingdon also found to perform well once account was taken of proposed infrastructure upgrades (namely the Lodge Hill Park and Ride, and now the bus lane along the edge of the A34, north from the Lodge Hill Park and Ride).
- 4.8 In light of the above work, and other work streams dealing with matters including education and transport infrastructure capacity, a report was published entitled "A Countywide Approach to Meeting the Unmet Housing Need of Oxford". Appendix 5 of the report classified the merits of each of the 36 sites on a red/amber/green (RAG) scale, with the total capacity of sites with a green RAG status then proposed as an appropriate unmet need apportionment figure for each of the four districts surrounding Oxford City. Within the Vale, three sites were assigned a green RAG status – Abingdon North (1,100 homes), Botley (550 homes) and Cumnor (550 homes).
- 4.9 At the meeting of the Oxfordshire Growth Board on 26th September 2016, which discussed the above, the Growth Board Programme Manager confirmed that '*...the areas of search identified were not to be taken as proposed for development sites but were, as made clear in the report and appendix, evidence of Districts' ability to meet part of Oxford's unmet housing need*'.
- 4.10 The key point here is that if the Oxfordshire Growth Board work provides evidence of a District's ability to meet part of Oxford's unmet housing need, the areas under consideration (including Abingdon North) must have in-principle merit as development locations, otherwise they provide no such evidence of a District's ability to meet part of Oxford's unmet housing need. Indeed, the Council's Site Selection Topic Paper (October 2017) acknowledges the importance and role of the Oxford Spatial Options Assessment 2016 in determining the apportionment of the Oxford City unmet need (paragraph 2.23).
- 4.11 Further development at North Abingdon (Abingdon North) is clearly accepted by the Council as a reasonable alternative, and must therefore be fully and robustly assessed in the Local Plan Part 2 work. We provide detailed comment below on the assessment made of Abingdon North, but the headline concern is that how, within just 12 months, can two assessments be made of the land at North Abingdon, with the first suggesting a capacity in the area for some 1,100 units, and the second suggesting that the capacity may be limited to the redevelopment of the previously developed parts of the site only (suggesting a capacity for just some 50 units).

Spatial Strategy

- 4.12 The Local Plan Part 1 (Core Policy 3, Settlement Hierarchy) sets the spatial strategy for development in the Vale. As above, it confirms that the Market Towns have *'the ability to support the most sustainable patterns of living'* and *'have the greatest long-term potential for development'*. Conversely, Larger Villages have a *'more limited range of employment, services and facilities'* and Smaller Villages have *'a low level of facilities and services'*.
- 4.13 The Local Plan Part 1 develops the spatial strategy for the District with reference to three sub-areas – the Abingdon-on-Thames and Oxford Fringe, South-East Vale and Western Vale.
- 4.14 Draft Core Policy 4a (and closely related draft Core Policy 8a) of the Local Plan Part 2 provide for some 2,020 new dwellings on new sites in the Abingdon-on-Thames and Oxford Fringe Sub-Area, although of these (as set out in Table 2.1 of the draft Local Plan Part 2) only the Dalton Barracks site is considered to be close to and accessible to Oxford.
- 4.15 CEG supports the focus on the Abingdon-on-Thames and Oxford Fringe Sub-Area, but would suggest that all the 2,200 dwellings (Oxford City's unmet housing need to be accommodated through Local Plan Part 2 allocations) should be accommodated within this Sub-Area, on sites that are close to and accessible to Oxford. In this regard, it is notable that Abingdon North is close to Oxford, and has frequent and reliable public transport links to the City, with a premium bus service between Abingdon and Oxford City, that passes through the North of Abingdon-on-Thames strategic allocation (and land immediately to the north).
- 4.16 These public transport links are likely to be further enhanced over the Plan period, with the County Council's plans for Park and Ride services from Lodge Hill, in association with the planned provision of an all movement junction on the A34 at Lodge Hill. There are also plans to provide a single carriageway bus lane between the Lodge Hill A34 Interchange and Hinksey A34 Interchange. Draft Core Policy 12a proposes to safeguard land for these strategic highway improvements, all of which will increase the efficiency and attractiveness of public transport services from the North Abingdon area.
- 4.17 CEG supports the safeguarding of land for these strategic infrastructure works, as set out Core Policy 12a.

Additional Sites - Local Plan Part 2

- 4.18 As well as seeking to ensure that the Local Plan Part 2 allocations effectively address the housing needs arising from Oxford City, it is important that the additional proposals fit with the spatial strategy and settlement hierarchy established in the Local Plan Part 1. CEG is concerned that having established a strategy that recognizes that development adjacent to the District's Market Towns (namely in this case, Abingdon) offer the best ability to support sustainable patterns of living, none of the additional sites proposed in the Local Plan Part 2 are adjacent to Abingdon.
- 4.19 Indeed, the additional sites in the Abingdon-on-Thames and Oxford Fringe Sub-Area are all adjacent to Larger or Smaller Villages, the third and fourth tier settlements in the Local Plan settlement hierarchy. As a generality, and as a whole, the additional allocations proposed in the Local Plan Part 2 (Publication Version) sit uncomfortably with the spatial strategy and settlement hierarchy established in the recently adopted Local Plan Part 1.

- 4.20 The Site Selection Topic Paper 2 (October 2017) seeks to down play the importance and relevance of the LUC Spatial Options Assessment. As above, the District Councils clearly felt that this work was sufficiently robust to determine the distribution of Oxford City's unmet housing needs, and it therefore follows that the land areas (or broad locations) identified by this Assessment as being deliverable warrant full and careful consideration.
- 4.21 The Topic Paper seeks to justify the District Council's change in position on the status of the sites in the Local Plan Part 1. In correspondence with the Inspector and Oxford City Council during the Examination, the Vale of White Horse District Council made it clear that it was the role of Local Plan Part 2 to allocate sites to meet its proportion of Oxford City's unmet housing need. It was acknowledged during the Examination that new housing, particularly in the north of the District, could be said to be meeting the Vale's needs or Oxford City's needs, but even with this recognition, the Vale of White Horse District Council maintained that it would be the role of Local Plan Part 2 to allocate the additional sites to meet the District's share of Oxford's unmet housing needs.
- 4.22 The Site Selection Topic Paper 2 (October 2017) outlines the site selection process for Local Plan Part 2. It confirms that the selection process began with the Housing and Economic Land Availability Assessment (HEELA) work. This identifies land to the north of Abingdon (ABIG01, ABIG02 and ABIG03) as suitable in principle, available and achievable.
- 4.23 Appendix A of the Site Selection Topic Paper (October 2017) confirms that these three individual HEELA sites to the north of Abingdon were then merged for the purposes of detailed testing. The merged sites were renamed HEELA_A (or ABIG_A). Appendix B of the Site Selection Paper (October 2017) outlines the findings of the assessment of HEELA site HEELA_A (ABIG_A). We provide further comment on this below.
- 4.24 As a matter of general principle, we are very concerned that by grouping the aforementioned land parcels together for the purposes of the main assessment, the Council's overall conclusions were inappropriately and unreasonably influenced by the land to the east of Oxford Road, which has a different character, and is more sensitive.
- 4.25 The Council has sought to retrospectively address the issue by preparing an Addendum Landscape Capacity Assessment (October 2017), a Green Belt Study of Local Plan Part 2 Sites (October 2017), and an updated Site Selection Topic Paper 2 (October 2017) - but with no new sites introduced as a result of this work (anywhere in the District) it appears that the exercise was not approached with an open mind. It would seem that the exercise was simply undertaken to seek to address a flaw in the evidence base – created (in part) by the Council's overly simplistic assessment of the land to the north of Abingdon, which informed the preparation of the Local Plan Preferred Options consultation material.

North of Abingdon – Site Assessment

- 4.26 CEG controls all of the North of Abingdon-on-Thames Local Plan Part 1 strategic allocation, along with additional land to the north, west of Oxford Road (see Plan attached as **Appendix A**).
- 4.27 CEG are focused on delivering the strategic allocation at North Abingdon, but wish to ensure that a robust assessment is made of the land in the vicinity through the Local Plan Part 2 process.
- 4.28 The assessment made by the District Council of the land to the north of the North of Abingdon-on-Thames strategic allocation, for the purposes of informing the Preferred Options consultation

document, was not robust. It adopted an all or nothing approach to assessing the suitability of the land to accommodate development.

- 4.29 As set out in our response to the Preferred Options consultation, we believe a clear anomaly exists along the northern boundary of the existing strategic allocation. The land allocation boundary creates an indented triangle located between parcels A and B as annotated on the Plan attached as **Appendix A** - plan DE187_2_00. This triangle is contained by the same Green Belt boundary hedgerow as Parcel B, but was not promoted for removal from the Green Belt due to land ownership constraints that existed at the relevant time. This land is now controlled by CEG as part of a wider land area, and it is logical to apply the rationale for the current Green Belt boundary for the North Abingdon allocation consistently.
- 4.30 In doing so, this indented triangle of land, which is some 1.6 hectares in size and would deliver in the region of 30 dwellings, should now logically be removed from the Green Belt through the Local Plan Part 2 process.
- 4.31 This land at present includes open scrubland, a public footpath and a drainage corridor with riparian trees to the eastern extent of the land parcel. Taking these landscape elements into account, it is considered that a developable area of around 1 hectare is appropriate, resulting, as above, in a likely capacity of around 30 dwellings.
- 4.32 In respect of the purposes of the Green Belt, this land performs to the equivalent degree as land allocated for development at North Abingdon in the Local Plan Part 1. It has the same Green Belt boundary as the allocated parcel B, and logically should be removed from the Green Belt to provide a consistent approach and deliver a Green Belt boundary that has integrity with the existing natural boundaries.
- 4.33 In terms of the further land to the north of the North of Abingdon-on-Thames strategic allocation, the Site Assessment Proforma at Appendix A of the Site Selection Topic Paper (October 2017) identifies an extensive swathe of land, straddling Oxford Road. The findings of the Assessment of this wider land parcel are reported at Appendix B of the Site Selection Topic Paper (October 2017). The Council suggests the land has an indicative capacity for some 2,000 additional dwellings.
- 4.34 CEG are not proposing or supporting this scale of development, but do believe that for the purposes of the Preferred Options consultation, the District Council should have undertaken a more sensitive assessment of the capacity to deliver further sustainable development in this area, in light of the adopted spatial strategy and settlement hierarchy, the findings of the Growth Board work and the opportunity to make best use of planned infrastructure improvements.
- 4.35 In terms of some of the specific points raised on the Site Assessment Proforma, as now updated (October 2017):

- **Proforma - High value landscape in a prominent Green Belt location, with some views of Oxford City on higher ground.**

CEG Response - West of Oxford Road there is significant existing built-form, with the A34, proposed Lodge Hill Slips, Park and Ride facility and permitted development to the south all having a further urbanising impact on the area generally. There would be no views of Oxford City from much of the land to the west of Oxford Road, with opportunities to retain and strengthen existing buffer planting.

The Councils Draft Landscape Capacity Study (March 2017) provided a sifting assessment of the various sites (including Site 10, North of Abingdon) and concluded that none of the site could be developed. Such a stark conclusion is not supported by the Study's brief commentary, and is of course completely at odds with the Oxfordshire Growth Board's work, which provided evidence of the ability of land at Abingdon North to accommodate some 1,100 additional dwellings.

The Landscape Capacity Addendum Report (October 2017) considers a revised area, enclosed by the A34, Oxford Road to the east and permitted development to the south (on the North of Abingdon-on-Thames strategic allocation). The Addendum assessment suggests that the capacity for development varies across the site, with potential for redevelopment of the previously developed areas without harm to the landscape. On the ridgeline and open slopes to the north and south, the Council's assessment concludes that development could have significant adverse effects on the landscape and on views from the surroundings, with the potential for removal of existing trees.

CEG do not believe that the Council's Addendum assessment gives sufficient weight to the urbanising impact of planned and permitted development in the vicinity. The Addendum assessment confirms that there is the capacity for development in this area. We would strongly suggest that if approached sensitively, with carefully sited development parcels and appropriate retention and strengthening of structural planting, development could occur without any significant adverse effects of the landscape.

- **Proforma - Would lead to some inter-visibility between Oxford and Abingdon-on-Thames.**

CEG Response - Much of the land west of Oxford Road would have no inter-visibility with Oxford. Topography and existing tree belts and hedgerows would screen views from Oxford.

- **Proforma (March 2017) – The site contributes strongly to Green Belt purposes.**
- **Proforma (October 2017) – The majority of the land to the west of Oxford Road contributes to the overall aims and purposes of the Green Belt and any development within the site would harm the integrity of the wider Oxford Green Belt.**

The District Council has undertaken further Green Belt work since the publication of the Preferred Options document in March 2017, and in the October 2017 version of Topic Paper 2, do not conclude that the subject land (to the west of Oxford Road) contributes strongly to the purposes of the Green Belt. CEG would agree with this conclusion.

The Council's Green Belt Study of Local Plan Part 2 Sites (October 2017) makes an assessment of the land contained by the A34, Oxford Road and permitted development to the south. The Council's own work clearly concludes that the land does not contribute strongly to the purposes of the Green Belt. For the reasons set out below, we would go further, and suggest that overall, the subject land makes a low contribution to the purposes of the Green Belt. Taking each Green Belt purpose in turn:

Purpose 1 – To check the unrestricted sprawl of large built-up areas

We would agree with the Council that the subject land makes no contribution to checking the unrestricted sprawl of large built-up areas (Green Belt Purpose 1).

Purpose 2 – To prevent neighbouring towns merging into one another

In terms of Green Belt Purpose 2, the Council considers the subject land to play a 'medium' role in this respect, suggesting that development would 'directly reduce the separation between Abingdon and Kennington (part of the Oxford conurbation)'. This assessment is incorrect. Permitted development on the North of Abingdon-on-Thames strategic allocation will extend the built form of Abingdon to within approximately 1.6km of Kennington (if development along Sugworth Lane is taken as the start of Kennington). This is the same distance as between any development permitted at the very north-eastern edge of the subject land (adjacent to Oxford Road) and development along Sugworth Road.

We would suggest that the land contained by the A34, Oxford Road and permitted development to the south makes a low contribution to Green Belt Purpose 2.

Purpose 3 – To safeguard the countryside from encroachment

In terms of Green Belt Purpose 3, we consider that the subject land makes a medium to low contribution to safeguarding the countryside from encroachment, given the significant amount of existing built form on the site, the existing urbanising influence of the A34 and Oxford Road, and the future urbanising influence of planned development to the south and the proposed Park and Ride to the north.

Purpose 4 – To preserve the setting and historic character of historic towns

Finally, in terms of Green Belt purpose 4, we would agree that the subject site has no relationship with the historic core of Oxford, and is not one of the landscape features considered to play an important role in the setting of the City.

The Council has chosen to introduce a new 'constraint' in the Green Belt Study of Local Plan Part 2 Sites (October 2017), which is whether an area of Green Belt contributes to the setting and special character of Abingdon. This was not a matter considered in preparation of the Local Plan Part 1, and we question the reasoning behind the change in approach. More importantly, we do not believe that the subject land contributes towards this purpose. The subject land is some 2km from the historic core of Abingdon, with post-war housing estates leading up to Dunmore Road, and planned development on the North of Abingdon-on-Thames strategic allocation, all severely limiting any form of 'connection' between the historic core of Abingdon and the subject land.

We believe that the subject land makes a very low (or no) contribution to Green Belt Purpose 4.

There is no evidence presented by the Council that development of the subject land would harm the integrity of the wider Oxford Green Belt, other than de facto, there would be a reduction in the overall extent of the Green Belt.

- **Proforma - The site to the south has already been subject to master planning, with a strong defensible GB boundary, resulting in challenges in respect of scheme integration.**

CEG Response – The permitted outline scheme is accompanied by an indicative masterplan, with ample scope to amend the scheme to enable integration as required, without adversely impacting on the delivery timetable for the North of Abingdon-on-Thames strategic allocation.

- 4.36 The above commentary addresses all of the 'red' issues in the Proforma (as updated, October 2017). We note that previously the Council raised issues with the potential impact of development on the historic environment, but the updated Proforma appears to recognise that these issues were principally associated with land to the east of Oxford Road. If development is limited to the land west of Oxford Road, any impacts on the historic environment would be significantly reduced and would be capable of mitigation.
- 4.37 To conclude, CEG are concerned that the District Council's evidence base is not robust in relation to its assessment of the land north of the North of Abingdon-on-Thames strategic allocation. Accordingly, CEG do not believe that the strategy and allocations in the Local Plan Part 2 (Publication Version) are the most appropriate, given the reasonable alternatives.
- 4.38 The issues identified above are inevitably carried through into the Sustainability Appraisal of the Local Plan Part 2 (September 2017). Whilst noting that land at North of Abingdon-on-Thames is very well linked to Oxford and is adjacent to the largest settlement in the Abingdon-on-Thames and Oxford Sub-Area, the reasons for not taking the site forward in Local Plan Part 2 appear limited to the fact that the land sits within the Green Belt, and that in the Council's view development is very constrained in landscape terms.
- 4.39 We have established above that upon further assessment the Council now appears to accept that the subject land does not contribute strongly to the purposes of the Green Belt. Indeed, we would argue strongly that even the Council's most recent assessment over-plays the contribution that the subject land makes to the purposes of the Green Belt. In terms of landscape impact, the Council accepts that the land west of Oxford Road is less sensitive in landscape terms than the land to the east of Oxford Road, and indeed the Council's own assessment indicates that there is capacity for development in this area.

5 GREEN BELT

- 5.1 Draft Core Policy 8b: Dalton Barracks Comprehensive Development Framework, and Core Policy 13a: Oxford Green Belt, propose release areas of developed and undeveloped land at Dalton Barracks from the Green Belt.
- 5.2 CEG support the general principle of redevelopment the previously developed land at Dalton Barracks, but do have concerns over the timely delivery of development. There are a number of examples of delays in the delivery of development on former MOD sites, and given the need to prepare a Comprehensive Development Framework, then an outline planning application and future reserve matters applications, it is felt that the delivery of 1,200 unit before 2031 is ambitious.
- 5.3 Setting to one side our concerns over the timely delivery of development at Dalton Barracks, the Council has set out the 'exceptional circumstances' considered to exist to justify the amendment to the Green Belt boundary, namely:
- The release of a significant site for development, not previously considered available, and so not previously considered either by the Oxfordshire Growth Board as a potential site to accommodate unmet housing need for Oxford, or by the Vale of White Horse through preparation of the Local Plan 2031: Part 1. This change is considered to be a 'major change in circumstances';
 - A Green Belt Study of the Dalton Barracks site and surrounding land demonstrates that its removal from the Green Belt and development would have limited impact on the function of the Green Belt;

- The site is close to Oxford and has the potential to be developed as a highly sustainable new community with excellent public transport, walking and cycling connectivity to Oxford and Abingdon-on-Thames and is considered to be compatible with the 'spatial strategy' set out in the Part 1 plan; and
- The site contains a large area of brownfield (previously developed land).

- 5.4 CEG endorses the view that there are the exceptional circumstances to warrant a Green Belt boundary review, but do not believe this should be constrained solely to amendments to the Green Belt boundary at Dalton Barracks.
- 5.5 The Oxfordshire Growth Board work identified additional sites or areas considered suitable to meet a proportion of Oxford City's unmet housing need, and this is also considered to be a major change in circumstances since the Local Plan Part 1 was prepared and submitted for Examination. The Green Belt Study for Dalton openly acknowledges the difference between a Green Belt review covering a whole District, and the work undertaken here, which assumes that the exceptional circumstances for new development within the Green Belt have been met, with the focus then being on testing the potential impact of removing a specific site from the Green Belt.
- 5.6 The suggested proximity of Dalton Barracks to Oxford is all relative, and it is certainly the case that there are other sites in the District that are better related to Oxford, better related to existing facilities and services, better placed to make use of existing and planned new infrastructure, and are a far better fit with the adopted Spatial Strategy for the District.
- 5.7 There is a significant amount of existing built development at Dalton Barracks, but this could be redeveloped whilst the land remains in the Green Belt, and is not in itself an effective argument for review of the Green Belt boundary solely at Dalton.

6 SUMMARY AND CONCLUSIONS

- 6.1 This letter of representation (and related Representation Forms) are submitted on behalf of CEG. CEG controls all of the North of Abingdon-on-Thames Local Plan Part 1 strategic allocation, along with additional land to the north, west of Oxford Road (see Plan attached as **Appendix A**).
- 6.2 CEG are making very good progress with the timely delivery of development on the Part 1 strategic allocation, and wish to maintain the strong and positive working relationship with the District and County Councils, as well as other stakeholders and the local community.
- 6.3 The adopted Local Plan Part 1 recognises that the Market Towns (including Abingdon) have the ability to support the most sustainable patterns of living within the Vale. Further, the Local Plan Part 1 Inspector and Council (with reference to Core Policy CP2 and the supporting text to Core Policy CP13) clearly accept that further Green Belt land releases (in Local Plan Part 2) are both potentially appropriate and acceptable to address housing needs.
- 6.4 We believe that the District Council should be identifying new sites in Local Plan Part 2 to meet an unmet housing need from Oxford City of at least 2,200 dwellings. Further, we believe that all of these additional dwellings aimed at meeting Oxford's needs should be located in the Abingdon-on-Thames and Oxford Fringe sub-area, close to and accessible to Oxford.
- 6.5 Land at North Abingdon provides the best opportunity to deliver new housing that is accessible to Oxford; accessible to the facilities and services available within Abingdon; and makes best use of planned infrastructure improvements (including the Lodge Hill slips, Lodge Hill Park and Ride, A34

Bus Lane and new local centre and primary school on the North of Abingdon-on-Thames strategic allocation). At a strategic level, North Abingdon clearly fulfils the necessary requirements for allocation in Local Plan Part 2.

- 6.6 The work of the Oxfordshire Growth Board (of which the Vale of White Horse District Council is a member) endorsed the merits of North Abingdon as a development location. The agreed apportionment of Oxford City's unmet housing need was based in part on the content of the report entitled "A Countywide Approach to Meeting the Unmet Housing Need of Oxford", which suggested a capacity for some 1,100 additional dwellings at Abingdon North.
- 6.7 We are concerned that within just 12 months, the assessed capacity for development at Abingdon North has reduced from some 1,100 units (the work of the Oxfordshire Growth Board) to just some potential for redevelopment on the previously developed parts of the land (west of Oxford Road).
- 6.8 We do not believe that the Council's strategy and allocations, as set out in draft Policy 4a and draft Policy 8a are justified, as they are not the most appropriate when considered against reasonable alternatives, based upon the available evidence.
- 6.9 As a matter of general principle, we are very concerned that by grouping three land parcels at North Abingdon together for the purposes of assessment, the Council's overall conclusions were inappropriately and unreasonably influenced by the land to the east of Oxford Road, which has a different character, and is more sensitive.
- 6.10 The Council has sought to retrospectively address the issue by preparing an Addendum Landscape Capacity Assessment (October 2017), a Green Belt Study of Local Plan Part 2 Sites (October 2017), and an updated Site Selection Topic Paper 2 (October 2017) - but with no new sites introduced as a result of this work (anywhere in the District) it appears that the exercise was not approached with an open mind.
- 6.11 In this representation we have reviewed the District Council's evidence base, and suggest that the land at North Abingdon (west of Oxford Road):
- Provides very limited opportunity for inter-visibility with Oxford;
 - Could be developed without a significant adverse landscape impact, with carefully sited development parcels and appropriate retention and strengthening of structural planting;
 - Only makes a low contribution to the purposes of the Green Belt overall;
 - Could be satisfactorily integrated with planned development on the North of Abingdon-on-Thames strategic allocation, without delaying delivery on the Local Plan Part 1 site.
- 6.12 CEG believes that there is scope to address an anomaly with the northern boundary of the North of Abingdon-on-Thames strategic allocation, and that secondly there is scope for a further release of Green Belt land to the north, contained by Oxford Road to the east and the A34 to the west.
- 6.13 CEG supports the safeguarding of land for strategic infrastructure works, as set out Core Policy 12a, with many of the schemes listed complementing development at Abingdon North.
- 6.14 We support the general principle of redevelopment of the previously developed land at Dalton Barracks, but do have concerns over the timely delivery of development. We endorse the view that there are the exceptional circumstances to warrant a Green Belt boundary review, but do not believe this should be constrained solely to amendments to the Green Belt boundary at Dalton Barracks.

As set out on the Representations Forms, we would like to be kept informed of progress with the Local Plan Part 2, and would like in due course to participate in the Local Plan Part 2 Examination.

Yours sincerely,

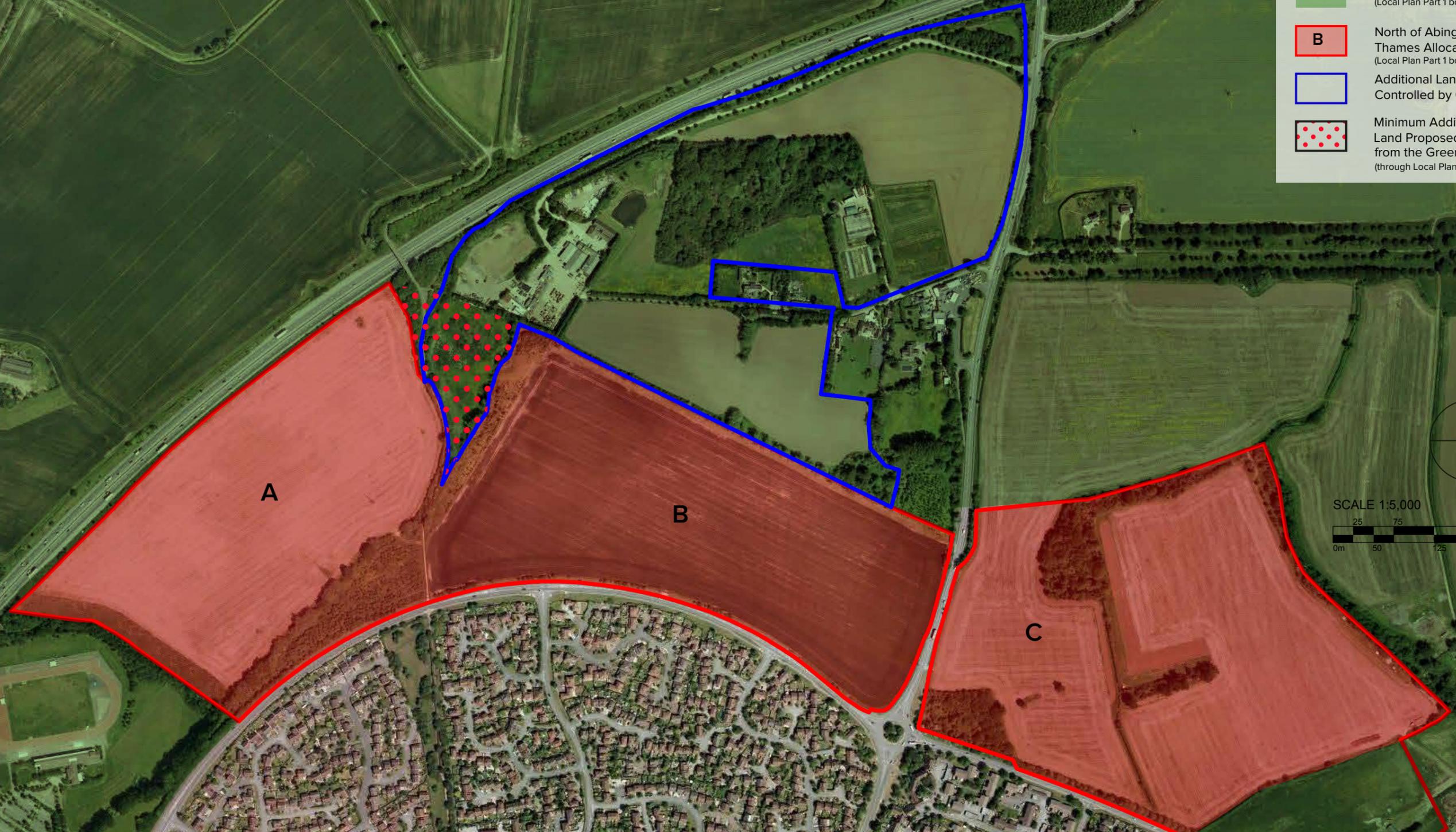
Ian Gillespie BSc (Hons) MRTPI
Director

t 01628 947637
m 07387 575101

Encs Representation Forms (5)
Appendix A – North Abingdon Plan

LEGEND

- Green Belt
(Local Plan Part 1 boundary)
- B** North of Abingdon-on-Thames Allocation
(Local Plan Part 1 boundary)
- Additional Land Controlled by CEG
- Minimum Additional Area Land Proposed for Release from the Green Belt (through Local Plan Part 2)



	Rev
DE187_2_001	Drg No
CEG	Client
Abingdon North	Project
VoWH Part 2 Reps	Title
1:5000	Scale



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Part A

1. Personal Details*

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Title

Mr

First Name

Iain

Last Name

MacSween

Job Title (where relevant)

Organisation representing
(where relevant)

CEG

Address Line 1

Address Line 2

Address Line 3

Postal Town

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Telephone Number

Email Address

2. Agent's Details (if applicable)

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Gillespie

Director

Igloo Planning

'The Garage'

41 Oak Tree Road

Marlow

SL7 3ED

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ian.gillespie@iglooplanning.com

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph 2.12 - 2.22 Policy 4a (Meeting our Housing Needs)

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant Yes No

4. (2) Sound Yes No

4. (3) Complies with the Duty to Cooperate Yes No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

SEE ACCOMPANYING COVERING LETTER DATED 22ND NOVEMBER 2017.

We do not consider that the Local Plan Part 2 is justified, as it is not the most appropriate strategy when considered against reasonable alternatives, based upon available evidence.

The Local Plan Part 2 should be identifying new sites to meet an unmet housing need arising from Oxford City of at least 2,200 dwellings. All of these additional dwellings aimed at meeting Oxford's needs should be located in the Abingdon-on-Thames and Oxford Fringe sub-area, close to and accessible to Oxford.

The sites selected for inclusion in Local Plan Part 2 are not justified. The distribution of the additional sites in the Local Plan Part 2 does not accord with the spatial strategy, settlement hierarchy or stated aims of the Local Plan Part 2, with only one of the additional sites identified considered by the Council to be close to and accessible to Oxford.

Further, the evidence base is flawed in respect of the assessment made of land at Abingdon North. The grouping together of a number of sites when first assessing the option of further development at Abingdon North meant that the Council's overall conclusions were inappropriately and unreasonably influenced by the land to the east of Oxford Road, which has a different character, and is more sensitive.

The Council has sought to retrospectively address the issue by preparing further evidence - but with no new sites introduced as a result of this work (anywhere in the District) it appears that the exercise was not approached with an open mind. It would seem that the exercise was simply undertaken to seek to address a flaw in the evidence base – created (in part) by the Council's overly simplistic assessment of the Abingdon North land (which informed the preparation of the Local Plan Preferred Options consultation material).

As above, more detail on the issues with the Council's evidence base in relation to Abingdon North are provided in the accompanying covering letter (22nd November 2017).

We believe that the Abingdon North land (north of the Local Plan Part 1 strategic allocation, and west of Oxford Road) makes a low contribution to the purposes of the Green Belt overall, and could be developed without a significant adverse landscape impact. Further it is very well positioned to take advantage of planned infrastructure improvements, and would be close to and accessible to Oxford.

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No, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

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

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Signature:

Date: 22nd November 2017

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First Name

Iain

Last Name

MacSween

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Organisation representing
(where relevant)

CEG

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Gillespie

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Marlow

SL7 3ED

01628 947637

ian.gillespie@iglooplanning.com

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Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph -

Policy 8a (Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area)

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Complies with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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Yes, I wish to participate at the oral examination

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Title

Mr

First Name

Iain

Last Name

MacSween

Job Title (where relevant)

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CEG

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Gillespie

Director

Igloo Planning

'The Garage'

41 Oak Tree Road

Marlow

SL7 3ED

01628 947637

ian.gillespie@iglooplanning.com

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph - Policy 8b (Dalton Barracks Comprehensive Development Framework)

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant Yes No

4. (2) Sound Yes No

4. (3) Complies with the Duty to Cooperate Yes No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

SEE ACCOMPANYING COVERING LETTER DATED 22ND NOVEMBER 2017.

We do not consider that the Local Plan Part 2 is justified, as it is not the most appropriate strategy when considered against reasonable alternatives, based upon available evidence.

Whilst we support the general principle of redevelopment of the previously developed land at Dalton Barracks, we do have concerns over the timely delivery of development. There are a number of examples of delays in the delivery of development on former MOD sites, and given the need to prepare a Comprehensive Development Framework, then an outline planning application and future reserve matters applications, it is felt that the delivery of 1,200 unit before 2031 is ambitious.

There is insufficient evidence (and therefore certainty) that Dalton Barracks will be able to deliver 1,200 dwellings in the Plan period.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.

SEE ACCOMPANYING COVERING LETTER DATED 22ND NOVEMBER 2017.

The Local Plan should be amended to include a more realistic scale of development delivery in the period to 2031 on the Dalton Barracks site.

(Continue on page 4 /expand box if necessary)

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Yes, I wish to participate at the oral examination

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Marlow

SL7 3ED

01628 947637

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Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy 12a (Safeguarding of Land for Strategic Highways Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area)

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant Yes No

4. (2) Sound Yes No

4. (3) Complies with the Duty to Cooperate Yes No

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SEE ACCOMPANYING COVERING LETTER DATED 22ND NOVEMBER 2017.

We support the safeguarding of land for the strategic infrastructure works set out in Policy 12a, which will further enhance the suitability and sustainability of the Abingdon North land.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.

NA

(Continue on page 4 /expand box if necessary)

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(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

Title

Mr

First Name

Iain

Last Name

MacSween

Job Title (where relevant)

Organisation representing
(where relevant)

CEG

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

2. Agent's Details (if applicable)

Mr

Iain

Gillespie

Director

Igloo Planning

'The Garage'

41 Oak Tree Road

Marlow

SL7 3ED

01628 947637

ian.gillespie@iglooplanning.com

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph - Policy 13a (Oxford Green Belt)

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant Yes No

4. (2) Sound Yes No

4. (3) Complies with the Duty to Cooperate Yes No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

SEE ACCOMPANYING COVERING LETTER DATED 22ND NOVEMBER 2017.

We do not consider that the Local Plan Part 2 is justified, as it is not the most appropriate strategy when considered against reasonable alternatives, based upon available evidence.

The Local Plan Part 2 sets out the ‘exceptional circumstances’ considered to exist to justify the amendment to the Green Belt boundary at Dalton Barracks (Local Plan Part 2, paragraph 2.75).

CEG endorses the view that there are the exceptional circumstances to warrant a Green Belt boundary review, but do not believe this should be constrained solely to amendments to the Green Belt boundary at Dalton Barracks.

The Oxfordshire Growth Board work identified additional sites or areas considered suitable to meet a proportion of Oxford City’s unmet housing need, and this is also considered to be a major change in circumstances since the Local Plan Part 1 was prepared and submitted for Examination. The Green Belt Study for Dalton openly acknowledges the difference between a Green Belt review covering a whole District, and the work undertaken here, which assumes that the exceptional circumstances for new development within the Green Belt have been met, with the focus then being on testing the potential impact of removing a specific site from the Green Belt.

The suggested proximity of Dalton Barracks to Oxford is all relative, and it is certainly the case that there are other sites in the District that are better related to Oxford, better related to existing facilities and services, better placed to make use of existing and planned new infrastructure, and are a far better fit with the adopted Spatial Strategy for the District.

There is a significant amount of existing built development at Dalton Barracks, but this could be redeveloped whilst the land remains in the Green Belt, and is not in itself an effective argument for review of the Green Belt boundary solely at Dalton.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.

SEE ACCOMPANYING COVERING LETTER DATED 22ND NOVEMBER 2017.

The Local Plan Part 2 should address the anomaly with the northern boundary of the North of Abingdon-on-Thames Local Plan Part 1 strategic allocation, and allocate land to the north (west of Oxford Road) for additional housing development; recognising its low contribution to the purposes of the Green Belt overall, the scope to develop the land without a significant adverse landscape impact, and the merits of the location in relation to the market town of Abingdon-on-Thames, Oxford, and the planned infrastructure improvements in the immediate vicinity.

(Continue on page 4 /expand box if necessary)

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.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination



Yes, I wish to participate at the oral examination

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

CEG played an active role in the Local Plan Part 1 Examination process, and have been working closely with the District Council to ensure early delivery of the North of Abingdon-on-Thames strategic allocation.

CEG controls land to the north of the strategic allocation, and wishes to participate in the Local Plan Part 2 Examination to help ensure the continued delivery of housing in the District, in the most sustainable locations.

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

Signature:

Date: 22nd November 2017

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of

the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan ✓

I would like to be added to the database to receive general planning updates ✓

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

See accompanying covering letter dated 22nd November 2017.

Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

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