

## Comment

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| Address   | c/o Agent<br>c/o Agent<br>c/o Agent  |
| Event Name  | Vale of White Horse Local Plan 2031 Part One - Publication   |
| Comment by  | Taylor Wimpey Uk Ltd and Persimmon Homes Limited<br>( )  |
| Comment ID  | LPPub1058  |
| Response Date   | 19/12/14 12:05   |
| Consultation Point  | Core Policy 8: Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area ( <a href="#">View</a> ) |
| Status  | Submitted  |
| Submission Type   | Web  |
| Version   | 0.1  |
| Q1 Do you consider the Local Plan is Legally Compliant?   | Yes  |
| Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)                     | No   |
| If your comment(s) relate to a specific site within a core policy please select this from the drop down list. | 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.

In particular there are concerns with the identification of, and justification associated with, the following specific strategic site allocations that remain proposals with the Publication Draft Plan:

North West Abingdon on Thames

An allocation of **200** dwellings is proposed for this Green Belt site. There is insufficient evidence to conclude that **200** dwellings can be achieved on this site, particularly given the flood risk and drainage constraints (not limited only to the presence of Flood Zones 2 and 3) and potential noise associated with the adjacent A34.

North Abingdon on Thames

This allocation has increased in size (from previous consultation) to around 800 dwellings (from 410) and the acceptable delivery is contingent on mitigation to address the landscape harm that would result from development at the site. Clearly suitability and sustainability advantages for the selection of this site, over those others not (currently) in the Green Belt and not subject to the same level of landscape harm have not been demonstrated.

South of East Hanney

A new allocation (from previous consultations) for **200** dwellings has been proposed at East Hanney. Whilst this is part of the Abingdon sub-area, Hanney is located at the Southern most part of this area, and has a close physical and functional relationship with both Grove and Wantage. The draft plan does not clearly identify why the proposed level of development (and strategic allocation) at Hanney (a larger village in the **Core Policy 3** settlement hierarchy) is justified.

Summary

Whilst **Persimmon Homes** and **Taylor Wimpey UK Ltd** do not object in principle to some limited release of Green Belt land, where this would not significantly offend the purposes of the Green Belt and is fully justified in sustainability terms, it is necessary (based on national planning policy) for *exceptional circumstances* to be shown to justify such alterations to the Green Belt boundary in all cases, and in respect of a number of sites the relative sustainability case has not been fully made, and actual capacity for development may be less than has been quoted.

On this basis fewer dwellings should/could be directed to this Sub-Area by the plan. In the context of the Vale of White Horse the context is particularly relevant as there are extensive areas outside of the Green Belt where further development can be appropriately directed, and indeed where the spatial strategy dictates that development should be focused (i.e. the higher order settlements within the South-East Vale sub area). In these circumstances it is not *essential* to release the quantity of land that has been suggested from the Green Belt, including the creation of extensive areas of new *white land* around existing settlements in the Green Belt, as sustainable alternatives exist. The Council's evidence has not justified as sound the overall approach that is being taken.

As the **NPPF** makes clear *the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open* (NPPF, Para 79). Although a number of the releases of land from the Green Belt proposed by the Council are small (in relative terms), the cumulative impact of these changes in terms of the Green Belt within the Vale of the White Horse District are likely to be significant. It is essential that proper regard is had to the importance that the Government attaches to Green Belt, and as part of this its essential characteristics of openness and permanence, before making the type of changes now proposed by the Plan.

A fundamental issue to be addressed 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

**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.