

## Comment

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<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>	LPPub1063
<b>Response Date</b>	19/12/14 12:07
<b>Consultation Point</b>	Core Policy 4: Meeting Our Housing Needs ( <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.**

**Persimmon Homes** and **Taylor Wimpey** support the Council in seeking to identify and meet its full objectively assessed need for housing, as well as the recognition that the area may be capable of accommodating additional development arising within the wider area (as set out as part of **Core Policy 2** : Cooperation on Unmet Housing Need for Oxfordshire). This is particularly the case in the South East Vale, which is a nationally significant growth area, is unconstrained by Green Belt, and where there are substantial suitable development areas outside of the AONB.

Given the importance of this issue, and as part of responding to the previous March 2014 Housing Delivery Update consultation, **Persimmon Homes** and **Taylor Wimpey** commissioned **Turley Economics** to critically review the available evidence cited as justifying the housing requirement set out in the draft Local Plan. This report can be made available if required but in summary it is considered that the methodology and outputs from the Council's SHMA are generally sound, and that the identified level of development ( **20,560** new homes in the Vale for the period 2011-2031, which equates to an annual housing target of **1,028** dwellings per annum) is sufficiently robust to form the basis of the Local Plan. It is considered that the general methodology which underpins this SHMA conforms to the **NPPF** and the **NPPG** . Further, the approach taken to place greater weight on an assessment of need based on balancing future job growth against a required labour force above a continuation of trend based projections is supported.

As recognised by **Core Policy 1** and **Core Policy 2** to account for the national *presumption in favour* as well as the potential for the area to meet needs arising within the wider area it will be necessary to keep under review available information and update and supplement relevant housing policies as the need arises. Identifying additional sites for additional capacity now would aid the overall flexibility and potential responsiveness of the plan to future changes in circumstances, as joint working with the other Oxfordshire Local Authorities is progressed (and where the recently published Oxford City Council Housing Land Availability Assessment helps to quantify the levels of unmet need that will need to be considered in the wider HMA). This approach would support the fundamental imperative of making sure that the plan (as a whole) provides for an adequate level of supply to meet needs for the area (as part of the wider Oxfordshire HMA) in full.

#### Overall Supply of Housing Sites

To be effective and sound it is essential that the Council's Local Plan secures a deliverable supply of housing land for at least the next five years (together with meeting the relevant provisions of the NPPF for the periods beyond this). On this basis it is concerning that the Council's evidence base does not specifically identify (clearly) the **3,169** *known commitments* which form part of the provision to meet the overall **20,560** dwelling requirement. It would assist all parties for this information to be made available, as without scrutiny it is not clear what this part of the supply is specifically comprised of (and whether there is any double counting), and if this results in any shortfall that may need to be addressed (to make the plan effective and sound) by additional **Part 1** or **Part 2** allocations.

Furthermore whilst **Core Policy 4** expresses the overall housing requirement for the District as at least 20,560 , the potential contribution from **Part 2** allocations is capped at **1,000** dwellings (*Up to 1,000* ?), with it further stated (footnote b), that this amount will be reduced based on proposals made as part of Neighbourhood Plans. This approach is not compatible with the **Core Policy 1** (and the Framework), or the part of the policy which expresses the overall housing requirement as an (at least) minimum figure. This part of the plan is not positively prepared or effective.

#### Abingdon-on-Thames and Oxford Fringe Sub Area

Whilst **Persimmon Homes** and **Taylor Wimpey** 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. Clear 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, Haney 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** 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 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 exists. 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 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); 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.

#### Western Vale Sub-Area

In general **Persimmon Homes** and **Taylor Wimpey** do not object to the overall approach to development in the Western Vale Sub-Area, where the lowest quantum of development is directed to reflect the relatively rural character of the area, and where development is predominantly required to support local services and facilities and/or to meet local needs. As in other locations however it is essential to fully assess and quantify (robustly) the actual capacity and deliverability of sites that are proposed for allocation. If the capacity of suggested sites has been over estimated there will be an overall shortfall, including in the first five year period, which should be made good by the allocation of additional land.

There is particular concern in respect of the **200** dwelling allocation directed to South West Faringdon, where the Landscape Capacity Study indicated that the majority of the site is unsuitable for development on landscape and visual grounds, with a maximum capacity of **115** homes. It seems to us that in this location, potentially together with some other sites, the Council has been overly optimistic in respect of the potential site capacity, thereby ensuring that the sites can meet the **200** unit threshold set (for

strategic site allocations) and possibly to also minimise the total number of sites that have been identified. In the case of South West Faringdon an area almost twice the size of that suggested in the Landscape Capacity Study has been proposed and it is very unlikely that **200** units would be achieved on this area.

South East Vale Sub-Area

**Persimmon Homes** and **Taylor Wimpey** support the Council's overall spatial strategy which seeks to focus sustainable new development in this part of the District, outside of the Green Belt, recognising both the capacity for growth and the national importance of the area for economic activity/growth.

As suggested above the Council should look to allocate additional suitable sites for development to assist in ensuring that overall requirements for housing can be met, including allowing a responsive and flexible approach to 'unmet need' from adjoining Oxfordshire Local Authorities. The North West Grove site (including land controlled by **Persimmon Homes** and **Taylor Wimpey** , as shown on the enclosed location plan) is a logical addition to development in this area so that the full vision for sustainable development at Grove can be realised (including **Core Policy 19** : Re-opening of Grove Railway Station). The Council's evidence base unequivocally confirms that the North West Grove site is suitable. Development can be brought forward in the short term to help contribute to short term delivery requirements (the first five year period), and would ensure flexibility in land provision to make sure that the Council's immediate and long term land supply was secure, to account for either shortfalls in the five year supply, and/or the ability to accommodate wider development needs from the wider (Oxfordshire) area. Identifying the North West Grove site would have a number of advantages with no significant disadvantages. The site is not subject to restrictive policy designations (Green Belt or AONB) and based on the presumption in favour of sustainable development , and government policy to boost significantly housing supply, can be identified for development now.

**Site 16** (North West Grove) performed better in the Interim Sustainability Appraisal than a number of sites that the Council has selected to be allocated and there is insufficient justification to inform the selection of other 'less sustainable' alternatives. Some elements where the North West Grove site (16) scored less well, such as access to education facilities and bus services, would be addressed by the other planned development in the area, and by development of the site itself.

The proposed saving of the previous Grove Airfield allocation (Local Plan policy H5) is essential to ensure that the policy position in respect of the Gove Airfield development is preserved, whilst the development is brought forward. The Council's strategy relies on the completion of this development and its policy status (as a commitment) should not be ambiguous within 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** 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 issues raised and participate in discussion.