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Dear Sirs

VALE OF WHITE HORSE LOCAL PLAN (PART 1) REPRESENTATION ON BEHALF OF COMMERCIAL ESTATES GROUP

1. INTRODUCTION

- 1.1 This representation is prepared and submitted by Carter Jonas on behalf of Commercial Estates Group [hereafter referred to as CEG] in respect of the allocation of the site known as North Abingdon-on-Thames [hereafter referred to as North Abingdon] for residential development of around 800 dwellings in the Publication Version of the Vale of White Horse Local Plan Part 1.
- 1.2 A site plan showing the current landownership of the allocation is attached as **Appendix A**.
- 1.3 CEG is currently the promoter of the western parcel of land forming the allocation; the area to the west of the A4183 Oxford Road. This parcel of land is in two separate ownerships; the Cecil Pilkington Charitable Trust owns the western part and the Greening family the eastern part (**Appendix A** refers).
- 1.4 The allocation land to the east of Oxford Road is owned by Radley College. The College has submitted a separate but complementary representation in respect of the allocation; also prepared and submitted by Carter Jonas.
- 1.5 There has already been early and positive dialogue between CEG and Radley College, and both parties are confident that they will be able to work together to ensure a comprehensive scheme at North Abingdon is delivered. Both parties support each other's representation and the wider site allocation.
- 1.6 The focus of this representation is on the deliverability of the North Abingdon land and the contribution it can make towards meeting the housing and other needs of the Vale. CEG are committed to working with the District Council, County Council, other stakeholders and Radley College to ensure the timely delivery of a high quality scheme on the North Abingdon land.

2. COMMERCIAL ESTATES GROUP (CEG)

- 2.1 CEG has a strong track record in delivering planning permissions on strategic sites - facilitating the delivery of new homes and related infrastructure.

- 2.2 CEG is a private company with strong financial backing that actively invests in a wide range of property assets across the UK. Land within the CEG Development portfolio ranges from urban to brownfield to greenfield and at present the strategic development land portfolio extends across 60 sites around the UK, with a completed development value of approximately £3 billion. The scale of these sites ranges from about 100 to 5,000 homes with varying related levels of supporting facilities and new infrastructure.
- 2.3 In the past year CEG achieved outline planning consents for around 4,500 dwellings and completed sales on over 2,500 plots with house building partners.
- 2.4 CEG places significant importance on partnership working with landowners, local authorities, other stakeholders and local communities. By way of example, CEG has recently worked closely with Thames Town Council to assist in delivery of its Neighbourhood Plan. At the local referendum more than 75% of local voters supported the Plan, which included 400 new homes promoted on land under the control of CEG.
- 2.5 For the North Abingdon land, CEG will ensure the finances are available to fully resource both the Local Plan process and subsequent preparation and submission of a planning application. The consultant team will be coordinated by CEG - ensuring delivery of a comprehensive and sustainable development.

3. LOCAL PLAN (PART 1) STRATEGIC COMMENTS

3.1 Housing Need

- 3.1.1 Objectively Assessed Needs: Paragraph 47 of the NPPF requires Local Plans to meet the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area. The presumption in favour of sustainable development within the NPPF (paragraph 15) sets out that plans should be based on meeting the need identified in full, where it is sustainable to do so.
- 3.1.2 The District Council's OAN are considered in the Oxfordshire Strategic Housing Market Assessment Final Report dated April 2014 (SHMA). This identifies a need for 20,560 homes in Vale of White Horse District in the period up to 2031.
- 3.1.3 The Local Plan housing target set out in draft Core Policy 4 (at least 20,560 dwellings in the period 2011-31) commits the Council to meeting in full the OAN for the Vale of White Horse.
- 3.1.4 **We welcome and fully support the Council's proposal to address in full the evidenced housing needs arising in the Vale of White Horse. Furthermore (as set out in section 3.1.10) we support the District Council's pragmatic approach to addressing any unmet needs arising elsewhere in the Oxfordshire Housing Market Area.**
- 3.1.5 Affordable Housing: The NPPF requires Local Plans to meet the full OAN for market and affordable housing (paragraph 47). The Oxfordshire wide SHMA indicates a need for 273 new affordable dwellings per annum in the Vale of White Horse.
- 3.1.6 Draft Core Policy 24 (Affordable Housing) proposes 35% affordable housing provision on all sites capable of a net gain of three or more dwellings (sites of at least 0.1 hectare), and a 75:25 split for rented and intermediate housing respectively. The draft Policy also makes provision for a different tenure mix or percentage of affordable housing – where viability issues are evidenced.
- 3.1.7 We concur with the Council's view that lowering the percentage of affordable housing on qualifying sites to 35% will assist viability, whilst still ensuring that the OAN for affordable housing can be met in full. Indeed, there is sufficient headroom in the Council's approach to allow for some sites to come forward with a lower percentage of affordable housing (i.e. less than 35%) and still meet the overall OAN for affordable housing.

- 3.1.8 **We support draft Core Policy 24 (Affordable Housing), which seeks 35% affordable housing on eligible sites and makes provision for a different mix or percentage of affordable housing where supported by viability evidence. The flexibility set out in the Plan will help to ensure that irrespective of changing circumstances or additional issues, the strategic sites will be deliverable.**
- 3.1.9 **A separate representation has been made in respect of the Preliminary Draft Charging Schedule (PDCS) for CIL. We have also commented separately (section 3.5) on the site infrastructure requirements under S106 (as set out in the Infrastructure Delivery Plan).**
- 3.1.10 Duty to Cooperate: Where a Council is unable to meet all of its own identified housing need, it is required by legislation (the 2011 Localism Act) and Policy (NPPF paragraphs 178-182) to work with adjoining local authorities to consider where any shortfall can be met.
- 3.1.11 Draft Core Policy 2 (Cooperation on Unmet Housing Need for Oxfordshire) sets out how the Council intends to continue to fulfil its statutory duty to co-operate. The draft Policy recognises that Oxford City may not be able to accommodate its own objectively assessed housing needs for the period 2011-2031 within its administrative boundary. Further work is needed to consider the extent to which Oxford City can meet its own needs and whether any unmet need should be accommodated within Vale of White Horse. This will involve the testing of spatial options and a full strategic review of the whole of the Oxford Green Belt.
- 3.1.12 We support this on-going joint working with the other Oxfordshire local authorities, and importantly, the Vale of White Horse District Council's commitment to the process.
- 3.1.13 However, it is important to be realistic about the timeframe for reaching agreement on –
- The extent of the unmet need to be accommodated beyond the administrative boundary of Oxford City;
 - The methodology for the strategic review of the Green Belt; and
 - The implications of the above and the extent of the unmet Oxford City housing need to be accommodated in each of the adjoining local planning authority areas.
- 3.1.14 In the context of the above and the pressing need for the Vale of White Horse District Council to meet its own housing needs as quickly as possible, we believe that it is essential that the Local Plan (Part 1) is progressed without delay. There would be no merit in the Vale of White Horse District Council awaiting completion of the process outlined at paragraph 3.1.13 above - as this would risk significantly delaying progress in meeting the OAN for the Vale of White Horse.
- 3.1.15 We endorse the commitment in draft Core Policy 2 to undertake a full or partial review of the Local Plan 2031, or to allocate sites through a subsequent DPD, should there be a requirement to meet any Oxford City unmet housing need within the District.
- 3.1.16 **We strongly support the proposal to progress with the Local Plan (Part 1) on the basis of meeting the District's own objectively assessed housing needs, whilst simultaneously working with the other Oxfordshire authorities to address any unmet needs in the wider Housing Market Area.**

3.2 The Spatial Strategy

- 3.2.1 The NPPF sets out a presumption in favour of sustainable development.
- 3.2.2 The Local Plan seeks to deliver sustainable growth in accordance with its Spatial Strategy. One of the strategy's three key strands is to reinforce the service centre roles of the main settlements across the District by focusing housing growth at the Market Towns, Local Service Centres and Larger Villages.

- 3.2.3 Draft Core Policy 3 (Settlement Hierarchy) classifies Abingdon as a Market Town which has the ability to support the most sustainable patterns of living within the Vale. Market Towns are considered to have the greatest long-term potential to provide jobs and housing needed to support sustainable communities.
- 3.2.4 Draft Core Policy 8 (Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area) makes clear that the Council's over-arching priority for this sub-area is to maintain the service and employment centre roles for Abingdon and to develop in accordance with the settlement hierarchy set out in Draft Core Policy 3. The strategic allocations of Draft Core Policy 4 are reinforced here.
- 3.2.5 Abingdon is the District's largest settlement and is a thriving market town providing accessible employment, community, leisure and retail facilities. We support the Council's view that Abingdon should be a key focus for sustainable housing growth within the Vale.
- 3.2.6 In accordance with the Spatial and Sub-Area Strategies, Abingdon is the focus for new housing growth in the Abingdon-on-Thames and Oxford Fringe Sub-Area. This focus reflects the position of Abingdon in the proposed settlement hierarchy.
- 3.2.7 **The Spatial Strategy, Sub-Area Strategies and Settlement Hierarchy which focuses strategic housing growth at the three Market Towns (including Abingdon) is supported and is considered to comply with the Government's drive for delivering sustainable development.**
- 3.2.8 Land at North Abingdon is one of a number of strategic sites that have been selected following a comprehensive analysis of alternative site options and several stages of consultation - starting in 2007 (see Topic Paper 3: Strategic Sites Selection). We support the Council's clear preference to concentrate development at the main settlements to help support the vitality of the Vale's market towns, locate new housing close to more services and facilities, and to offer the best chance of securing new infrastructure.
- 3.2.9 It is clear from the evidence base that underpins the Local Plan (Part 1) that the options for housing growth at Abingdon are constrained. For example, further development to the south of the Town is constrained by the floodplain of the river Thames, and additional development to the west, by the physical barrier created by the A34. Further explanation is provided in the Council's Topic Paper 3: Strategic Site Selection.
- 3.2.10 The land forming part of the North Abingdon allocation to the west of Oxford Road was proposed as a site allocation for 410 dwellings in the Housing Delivery Update (February 2014), which was published in response to the increased housing needs evidenced by the Oxfordshire SHMA and informed by a Green Belt Review.
- 3.2.11 A representation in support of this allocation was submitted by Carter Jonas on behalf of the Cecil Pilkington Charitable Trust who own the western portion of the allocation (see land ownership plan at **Appendix A**) and a copy of this representation is attached for ease of reference as **Appendix B**. A representation by Adkins was also submitted in support of the allocation on behalf of the Greening Family. A copy of this is also included in **Appendix B**.
- 3.2.12 Taking on board the consultation responses received to the Housing Delivery Update (February 2014) and the findings of further assessment work undertaken in support of the Local Plan (Part 1), the Council has increased the North Abingdon allocation in the Publication Version of the Local Plan to include land to the east of Oxford Road – providing a total allocation of around 800 dwellings. The principal reasons for increasing the size of the allocation at North Abingdon include the conclusions from more detailed landscape work and the ability of a larger site to better deliver necessary new infrastructure, including a new primary school and full junction on the A34 at Lodge Hill (see further discussion at paragraph 4.4 below).

- 3.2.13 The increase in the allocation at North Abingdon to about 800 dwellings will also increase the proportion of new development in the District able to benefit from the wide range of employment, community, leisure and retail facilities available within Abingdon.
- 3.2.14 **We support the allocation of North Abingdon for around 800 dwellings, which accords with national policy and the Council's Spatial Strategy.**
- 3.3 Green Belt Boundary Review
- 3.3.1 To enable development at North Abingdon, the Local Plan (Part 1) proposes to remove the majority of the allocated land from the Green Belt.
- 3.3.2 The original designation of the Oxford Green Belt (in 1975) was intended to prevent the city from extending further into the countryside. The role of the Green Belt within the surrounding districts was to preserve the rural setting of the City.
- 3.3.3 The NPPF provides guidance for local authorities when undertaking a review of the Green Belt. It states that their permanence is an essential characteristic (paragraph 79) and advises that, "... *once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*" (paragraph 83).
- 3.3.4 It is clear that councils can review local designations to promote growth and to reflect local circumstances.
- 3.3.5 The Council completed a Green Belt Review in February 2014. The principal purpose of the Review was to assess the extent to which existing Green Belt land meets the five purposes of the Green Belt (as stated in paragraph 80 of the NPPF) and to inform the Council's identification of potential contingency sites for housing, in the light of the Oxfordshire SHMA 2014. It provides advice to the Council on the extent to which the land parcels are more or less essential to meeting the purposes and local objectives of the Green Belt.
- 3.3.6 The Oxford Green Belt has remained predominantly intact since it was approved in 1975.
- 3.3.7 **We believe there is compelling case for the Green Belt boundary to be reviewed and amended through the Local Plan (Part 1) - to promote growth and enable the District Council to meet its objectively assessed housing needs in a sustainable manner. The release of Green Belt land at North Abingdon is fundamental to delivery of the Council's Spatial Strategy and its ability to meet its objectively assessed housing need.**
- 3.3.8 **The process of preparing the new Local Plan (Part 1) provides the appropriate forum for considering whether there are exceptional circumstances that warrant alterations to the general extent of the Green Belt. We fully support the Council's Review and the proposed release of the majority of the North Abingdon land from the Green Belt.**
- 3.3.9 The Commercial Estates Group land interest lies to the west of the A4183 Oxford Road. The Green Belt Review clearly states that the allocation to the west of Oxford Road has potential for amendment (points 20 and 21 within land parcel 9 on pages 43-44). The Green Belt in this location does not make a contribution towards checking the unrestricted sprawl of Oxford or to preserving its setting. The settlement edge west of the A34 is also more important in maintaining the separation of Abingdon from Wootton than that to the east. East of the A34 makes a much lesser contribution to the sense of separation and to the perception of open countryside.
- 3.3.10 We endorse the conclusion of the Green Belt boundary review in relation to the North Abingdon land west of the A4183 Oxford Road. **The findings of the Green Belt Review support the release of this part of the site from the Green Belt as its contribution to the five main purposes of the**

Green Belt is limited. In light of the Review findings, and the need to provide for the District's housing needs in a sustainable way, the Council's proposal to remove this part of the site allocation from the Green Belt is fully supported.

- 3.3.11 Commentary on the Green Belt land at North Abingdon, east of the A4183 Oxford Road is provided in a separation representation submitted by Radley College.
- 3.3.12 **In overall terms, we support the proposed amendment to the Green Belt boundary at North Abingdon (as shown on the proposed Policies Map). We believe the proposed amendment will enable the delivery of a viable scheme for around 800 dwellings and related supporting infrastructure.**
- 3.4 Landscape Capacity
 - 3.4.1 Paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by (amongst other things) protecting and enhancing valued landscapes.
 - 3.4.2 Draft Core Policy 44 (Landscape) seeks to protect and the District's landscape from harmful development and enhance landscape features where possible.
 - 3.4.3 The Vale of White Horse Landscape Capacity Study 2014: Site Options (also referred to as The Vale of White Horse Landscape Capacity Study 2014: Contingency Sites) identifies that part of the site option (at North Abingdon) may be able to accommodate development without significant harm to the landscape and visual qualities of the site; its landscape setting; the landscape setting of local heritage, cultural and ecological assets; and the distinctive settlement pattern of the adjoining settlement or distinctive and separate character of nearby settlements.
 - 3.4.4 Paragraph 3.2.2 of the Study states that a development scenario based on a density of 25 residential dwellings per hectare (dph) (including the provision of open space serving the development, with dwellings of two or three storeys) has been assumed for each site as a guide against which sensitivity has been assessed.
 - 3.4.5 The Study shows that development within the western part of the wider allocation (west of the A4183 Oxford Road) can be accommodated in both landscape and visual terms with appropriate mitigation. This mitigation will include the location of the access, creation of substantive Green Infrastructure (GI), structural landscaping, retention of historic landscape features and development on the lower slopes. The capacity of the site has been calculated on the basis of this mitigation and therefore the reduced developable area.
 - 3.4.6 The estimated development capacity of the North Abingdon allocation, west of the B4183 Oxford Road, is about 410 dwellings.
 - 3.4.7 Commentary on the land at North Abingdon, east of the A4183 Oxford Road, is provided in a separation representation submitted by Radley College.
 - 3.4.8 **The masterplan for North Abingdon will take into account the requirements of draft Core Policy 44 and findings of the landscape capacity work and will be supported by a Landscape and Visual Impact Assessment (LVIA). Initial Landscape Capacity work is already underway to support comprehensive masterplanning work for the whole of the North Abingdon allocation, and we are confident that the mitigation measures outlined in the Landscape Capacity Study and North Abingdon land to the East of Oxford Road Landscape and Visual Feasibility Study, can be accommodated.**
 - 3.4.9 The Landscape Studies have been used to inform the site capacity, using a density of 25dph. At these densities and in light of the proposed developable areas suggested in the Landscape Studies - around 800 dwellings are proposed at North Abingdon.

3.4.10 We would suggest that the findings of the Landscape Capacity Studies are very conservative in terms of the developable areas, density of development and site capacity in landscape/visual terms. We believe that the landscape and visual impact of the proposed development at North Abingdon should be considered in more detail at the application stage, and supported by reference to a supporting LVIA. Flexibility should be afforded for landscape and visual impact to be considered on its merits at the time of the application.

3.4.11 **We would urge the Council to amend the Development Site Template for the North Abingdon allocation - to provide for this flexibility – removing the stipulation that future development should be limited to those parts of the sites identified in the Landscape Capacity Study.**

3.5 Infrastructure Requirements and Viability

3.5.1 The Council's Infrastructure Delivery Plan (IDP) (October 2014) identifies the infrastructure necessary to support the delivery of the Local Plan (Part 1). It supports draft Core Policy 7 (Providing Supporting Infrastructure and Services) which requires new development to provide for necessary supporting infrastructure.

3.5.2 The IDP is a high level summary of the essential infrastructure needed. The requirements are not exhaustive.

3.5.3 The Local Plan Viability Study considers the viability of the Local Plan and the strategic allocations, taking account of the IDP. The provision of essential infrastructure has been considered in viability terms (though preparation of the Local Plan and related evidence base), and therefore in our view, clause iii of draft Core Policy 7 is unnecessary.

3.5.4 Furthermore, in those circumstances where viability constraints are identified, the Council should make it clear how draft Core Policies 7 and 24 (Affordable Housing) will 'interact'. The Council makes provision for changes to the levels and tenure of affordable housing and for concessions to be made in relation to infrastructure provision (in terms of Place Shaping Infrastructure) – but there is no guidance on whether matters will be dealt with on a case by case basis, or whether the Council intends to operate some form of 'cascade' approach.

3.5.5 Not all the infrastructure requirements are included in the IDP. Most notably, Oxfordshire County Council (non highway) Health, Emergency Services and Thames Valley Police requirements. Further consultation with all interested agencies should continue to ensure the IDP is as comprehensive as possible. It is assumed that these will be funded by CIL rather than S106 obligations.

3.5.6 **Draft Core Policy 7 should be amended to remove clause iii and to make clear how the Council will balance infrastructure provision and affordable housing provision - where a development is demonstrated to be unviable.**

4. **LOCAL PLAN (PART 1) SITE SPECIFIC COMMENTS**

4.1 Land at North Abingdon - Opportunities

4.1.1 A plan showing the Opportunities and Constraints is attached as **Appendix C**.

4.1.2 The site is on the edge of the District's largest settlement.

4.1.3 There is good access to the town centre by bus, cycle and on foot. The town centre is only around 2km from the site and has seen recent investment and re-development. A range of convenience and comparison retail offers are available within the town, along with a range of employment opportunities.

- 4.1.4 Within short walking distance of the site is a local centre which includes a primary school, community centre, medical centre and kindergarten (Long Furlong). This centre is linked to the western portion of the site by an existing public right of way.
- 4.1.5 A short distance to the south of the eastern part of the site lies the Peachcroft Centre; a local shopping centre including a small supermarket, hairdressers, takeaway, dentist and pub. Peachcroft Pre-School also lies nearby.
- 4.1.6 The site lies adjacent to Tilsley Park Leisure Centre which offers a range of recreational and sporting facilities with opportunities for pedestrian linkages from the site.
- 4.1.7 There are existing bus services linking the site with the wider town and town centre. Services 41 and 42 run along Dunmore Road and Twelve Acre Drive with stops on Dunmore Road and Oxford Road. These stops also serve bus links to other settlements - notably Didcot, Wantage and Oxford.
- 4.1.8 There is also a delineated off road cycleway on the south side of Dunmore Road connecting into and around the town. The site is ideally placed to maximize the use of alternatives to the car.
- 4.1.9 There is an opportunity to improve the interface of the urban edge of Abingdon with the countryside beyond. At present this urban edge is defined by suburban housing estates presenting predominantly rear elevations to Dunmore Road. This does not provide a high quality approach into the town or a satisfactory relationship between the settlement edge and the wider landscape beyond. Development of the North Abingdon allocation will provide an opportunity for frontage development to create a strong and attractive streetscene, enhanced by sensitive use of open space and landscaping.
- 4.1.10 There are opportunities to provide significant Green Infrastructure and structural landscaping in accordance with draft Core Policy 45 (Green Infrastructure).
- 4.1.11 There are opportunities for biodiversity gains in accordance with draft Core Policy 46 (Conservation and Improvement of Biodiversity).
- 4.1.12 A larger site allocation as proposed will facilitate the delivery of key infrastructure such as a primary school and improvements to the A34.
- 4.1.13 The site is well contained by permanent and defensible boundaries. The A34 lies to the west and runs along part of the western boundary of the site. To the south and running along the site's southern boundaries are the local distributor roads of Dunmore Road and Twelve Acre Drive. To the northern and eastern boundaries are existing or new landscape features, which will be retained and strengthened where appropriate.
- 4.1.14 The development of the North Abingdon land represents a logical extension of Abingdon and a new, clear, long term defensible edge to the town will be created through appropriate masterplanning and landscaping.
- 4.1.15 **In summary, we believe the land at North Abingdon is in a highly accessible location, on the edge of the District's largest settlement, with good links to local services and facilities (which are capable of further enhancement). It provides an opportunity to secure a permanent, long term defensible and attractive edge to the town, and in our view, represents a logical extension.**
- 4.2 Land at North Abingdon - Constraints
- 4.2.1 Land to the north of Abingdon is less constrained than land elsewhere within the Town, but still lies within the Green Belt and within open countryside.

- 4.2.2 In respect of landscape impact, the Council's evidence base indicates that development at North Abingdon can be accommodated with appropriate mitigation. Mitigation measures will be addressed through the masterplanning of the site.
- 4.2.3 The Green Belt Review and other supporting evidence make the clear case for release of the land at North Abingdon from the Green Belt. Importantly, the land makes little contribution to the original purposes of the Oxford Green Belt – namely to check the unrestricted sprawl of Oxford and preserving the setting and special character of historic Oxford.
- 4.2.4 In terms of infrastructure constraints, the most notable is in respect of the water network/sewerage capacity, as evidenced by the Water Cycle Study. Further investigations will be undertaken and an initial dialogue will shortly commence with Thames Water. We are committed to working with the Council, Thames Water and the Environment Agency to find an acceptable and timely way forward.
- 4.2.5 There are also constraints that arise from the site's proximity to the A34 in respect of Noise and Air Quality. Initial work in respect of site capacity shows an overly generous buffer alongside the A34 to mitigate this potential constraint. Further work before the Examination will identify the impact of these constraints on the masterplan - but initial work suggests that with appropriate siting, landscaping and other mitigation measures these can be addressed without impacting significantly on the overall number of dwellings allocated to the site.
- 4.2.6 It is of note that each stage of the Local Plan preparation was informed by the iterative Evaluation of Transport Impacts (ETI) Study 2014.
- 4.2.7 The ETI assessed the impact of growth proposed within the Local Plan 2031 and one of its main purposes was to inform the selection of strategic development sites for inclusion within the Local Plan 2031.
- 4.2.8 Later stages of the ETI tested the new housing target for the Vale (20,560 homes derived from the Oxfordshire SHMA) and it was found that additional highway mitigation was required and schemes were identified through the ETI process.
- 4.2.9 The ETI Study demonstrates that the package of additional highway mitigation measures identified to be delivered alongside the additional local plan growth adequately off-sets any additional impacts associated with the additional housing.
- 4.2.10 On this basis and subject to the provision of the identified highway infrastructure found to be necessary (which is set out in the IDP) there is capacity within the strategic highway network to accommodate the planned development.
- 4.2.11 None of the allocated land at North Abingdon is designated for its nature conservation importance. Nor does any of the allocated land sit within an Oxfordshire Conservation Target Area (CTA) - which are the most important areas for wildlife, where targeted conservation action will have the maximum benefit. Further ecological work will be undertaken in support of the master planning of the site and, where necessary, appropriate mitigation measures will be proposed.
- 4.2.12 **In summary, we strongly believe that the North Abingdon site is deliverable with no insurmountable policy or technical constraints identified.**

4.3 Land at North Abingdon Development Principles

- 4.3.1 Taking into account the above opportunities and constraints it is clear that the site is capable of being developed in accordance with the Strategic Site Development Templates -although some refinement of the relevant Appendix is needed (further detailed comments are provided at paragraph 4.7 below).

- 4.3.2 Initial masterplanning work shows that appropriate landscaping and Green Infrastructure to comply with the Strategic Site Development Templates, Green Belt Study and Landscape Capacity Studies can be provided and will be included in the masterplan.
- 4.3.3 The site can be developed in accordance with draft Core Policy 37 Design and Local Distinctiveness and the Council's related aspirations. We are fully committed to working with the Council to deliver a high-quality and locally distinctive development that responds positively to the site and its surroundings and which enhances the setting of the town.
- 4.3.4 Initial technical work shows that mitigation in respect of noise/air quality from the A34 can be provided by an appropriate buffer and landscaping, without significantly impacting on the overall number of dwellings to be accommodated.
- 4.3.5 An appropriate mix of housing types and sizes can be provided to meet the identified housing need, and to accord with draft Core Policy 22 (Housing Mix).
- 4.3.6 An appropriate density can be provided across the site which will reflect local context and landscape character, whilst also making optimum use of land and creating a high quality public realm.
- 4.4 Development Capacity
- 4.4.1 The North Abingdon allocation proposes 'around' 800 dwellings.
- 4.4.2 At average densities of between 30dph and 35dph, initial masterplanning work suggests that at least 800 dwellings can be accommodated within the site without conflicting with draft Core Policy 38 (Design Strategies for Strategic and Major Development sites), the Site Development Templates, the Infrastructure Delivery Plan or the proposed draft Density Policy (draft Core Policy 23) of the Publication Version of the Local Plan. Furthermore, in coming to this view, we have taken into account the need for on-site infrastructure - most notably, a primary school, play areas, playing pitches, informal open space, SUDS, structural landscaping and Green Infrastructure.
- 4.4.3 Further masterplanning of the site is continuing, and in advance of the Local Plan Examination, a site wide masterplan will be progressed in liaison with the Council and other key stakeholders. In addition, the masterplanning work will be supported by a Landscape and Visual Impact Assessment to show that the site has the capacity for at least 800 homes in respect of landscape capacity.
- 4.4.4 **In summary, our view is at the North Abingdon land can accommodate at least 800 dwellings. Initial supporting technical work and masterplanning suggests that the site can accommodate more than 800 dwellings and remain policy compliant.**
- 4.5 Site-Specific Infrastructure
- 4.5.1 The Council's Site Selection Topic Paper 3 notes that the North Abingdon allocation (i.e. both parcels east and west of Oxford Road) would assist delivery of the primary school and A43 improvements.
- 4.5.2 The on-site provision of a 1.5FE primary school at an estimated cost of circa £8 million borne by the 800 dwellings at North Abingdon and the proposed 200 dwellings at North West Abingdon (1,000 in total) would equate to a cost of £8,011 per dwelling as opposed to the £13,132 per dwelling indicated in the Housing Update Paper (February 2014).
- 4.5.3 Similarly, the IDP suggests a cost per dwelling of £2,649 towards the A34 improvements with the site allocation at 800 dwellings. A figure of £3,571 per dwelling was required when the allocation was for just 410 dwellings. On these two matters, the per dwelling infrastructure burden has reduced by £6,000 per dwelling.

- 4.5.4 **We are committed to ensuring that the necessary infrastructure is in place to support development at North Abingdon. No ‘showstoppers’ in respect of infrastructure requirements have been identified, and we will work with infrastructure providers and the Council to secure the timely delivery of necessary supporting infrastructure.**
- 4.5.5 **The North Abingdon site is considered to be generally viable, with the essential infrastructure identified in the current version of the IDP, the Strategic Site Development Templates, CIL as currently proposed and 35% on site affordable housing provision. However, this situation will need to be kept under review as masterplanning work is progressed, and cost estimates and values are refined – and therefore we welcome the flexibility afforded in draft Core Policies 7 and 24.**
- 4.5.6 A Community Infrastructure Levy (CIL) is being prepared to support the delivery of the infrastructure identified and this is the subject of a separate representation. The IDP will also inform the Regulation 123 List of infrastructure projects that may benefit from CIL funding.
- 4.5.7 **There appear to be some anomalies in the IDP in that North Abingdon is to provide a new primary school through a S106 obligation. The CIL Regulation 123 List however suggests this would be funded by CIL as it is not one of the named exceptions. It is understood from discussions with the Council that this is an oversight, and the 123 List needs updating to include the North Abingdon allocation as one of the list of exclusions.**
- 4.5.8 **In our view, the primary education contributions (via S106) also need to be recalculated. The North Abingdon allocation is currently shown as paying the same financial contribution as North West Abingdon, and yet North Abingdon is also burdened with providing the land for the new school. The ‘gifting’ of the land needs to be factored into the financial contribution sought from the North Abingdon scheme (and the sums in the IDP re-calculated accordingly).**
- 4.5.9 Finally, upon discussion with the Council, it is understood that Police services and emergency services will be funded through CIL and not S106. It is understood that these will constitute ‘Other Social and Community Facilities’ in the CIL Regulation 123 List. Explicit reference should be made to these in the List for the avoidance of any doubt.
- 4.6 Deliverability
- 4.6.1 The North Abingdon site is owned by just three landowners (see plan attached as **Appendix A**). All three landowners support the allocation and are committed to delivering the site under a comprehensive masterplan.
- 4.6.2 CEG has been selected as the site promoters for the whole of the western portion of the site and active discussions are taking place with Radley College. Both parties have an on-going working relationship and are committed to delivering a sustainable development.
- 4.6.3 Initial technical work is already underway. Specialist consultants have either already been, or will be, appointed to carry out initial technical work to support the site allocation and delivery in the following areas:
- Landscape and Visual Impact Assessment (LVIA)
 - Phase 1 Ecological Survey
 - Water network and drainage
 - Highways and Access
 - Masterplanning
 - Noise and Air Quality

4.6.4 CEG will fund all planning application and professional fee costs where selected as the Promotion Partner (CEG is already the promotion partner in respect of the western portion of the site). Finance is available to progress an outline application.

4.6.5 **It is intended that an outline application will be ready for submission upon adoption of the Local Plan (Part 1).** This would allow for the following indicative timescale for delivery:

Autumn/Winter 2015	<ul style="list-style-type: none"> • Adoption of Local Plan Part 1 • Submission of Outline planning application
Autumn 2016	<ul style="list-style-type: none"> • Issuing of Outline planning permission
Winter 2016/early 2017	<ul style="list-style-type: none"> • Completion of sale of land
Summer 2017	<ul style="list-style-type: none"> • Submission of Reserved Matters applications
Autumn/Winter 2017	<ul style="list-style-type: none"> • Issuing of Reserved Matters Approval
Early 2018	<ul style="list-style-type: none"> • Commencement of development

4.7 Strategic Site Development Templates (Appendix A) comments

4.7.1 Flexibility should be incorporated into the Site Development Templates in respect of landscape capacity and developable areas.

4.7.2 The requirement for development to be limited to those parts of the site identified in the two Landscape Studies (which restrict development to the lower slopes) is inflexible.

4.7.3 Further detailed LVIA in support of the proposals could support development beyond these developable areas which does not cause significant landscape or visual harm.

4.7.4 There are a number of requirements where the requirement is absolute rather than qualified by the addition of wording to the effect of 'where necessary/ required'. All contributions or infrastructure provision should be qualified by 'where required'.

4.7.5 The site specific requirements in Section 3 refer to provision of a Police presence on site but this is not included in the Regulation 123 List, nor in the IDP. There does not appear to be evidence in support of this requirement and therefore it should not be included as a site specific requirement. Alternatively, it should be included in the Regulation 123 List.

4.7.6 The requirement to retain existing trees and hedgerows is vague and should be qualified by the addition of the wording 'where appropriate'.

4.7.7 Environmental Impact Assessments, Heritage Statements, Impact Assessments and Conservation Area Appraisals should only be undertaken where appropriate. These are not all required for all allocations.

5. SUMMARY AND CONCLUSIONS

5.1 We have completed a separate representation form for each of our comments set out above (see **Appendix D**). In summary terms:

- The allocation of land at North Abingdon for at least 800 dwellings is supported.
- There has already been early and positive dialogue between Commercial Estates Group and Radley College (who jointly control the North Abingdon allocation) and both parties are

confident that they will be able to work together to ensure a comprehensive scheme is delivered.

- Commercial Estates Group are committed to working with the District Council, County Council, other stakeholders and Radley College to ensure the timely delivery of a high quality scheme on the North Abingdon land.
- The Council's proposal to address in full the evidenced housing needs arising in the Vale of White Horse is fully supported. Furthermore, we strongly support the proposal to progress with the Local Plan (Part 1) on the basis of meeting the District's own objectively assessed housing needs - whilst the Council simultaneously works with the other Oxfordshire authorities to address any unmet needs in the wider Housing Market Area.
- We support draft Core Policy 24 (Affordable Housing). The flexibility set out in the Plan will help to ensure that irrespective of changing circumstances or additional issues, the strategic sites will be deliverable.
- We support the Spatial Strategy, Sub-Area Strategies and Settlement Hierarchy.
- We believe there is compelling case for the Green Belt boundary to be reviewed and amended through the Local Plan (Part 1).
- The release of Green Belt land at North Abingdon is fundamental to delivery of the Council's Spatial Strategy and its ability to meet its objectively assessed housing need.
- The findings of the Green Belt Review support the release of the land west of the A4183 Oxford Road from the Green Belt - as its contribution to the five main purposes of the Green Belt is limited. In light of the Review findings, and the need to provide for the District's housing needs in a sustainable way, the Council's proposal to remove this part of the site allocation from the Green Belt is fully supported.
- The Development Site Template for the North Abingdon Allocation should be amended to provide greater flexibility – removing the stipulation that future development should be limited to those parts of the sites identified in the Landscape Capacity Studies.
- Draft Core Policy 7 should be amended to remove clause iii and to make clear how the Council will balance infrastructure provision and affordable housing provision - where a development is demonstrated to be unviable.
- Land at North Abingdon is in a highly accessible location, on the edge of the District's largest settlement, with good links to local services and facilities (which are capable of further enhancement). It provides an opportunity to secure a permanent, long term defensible and attractive edge to the town.
- We strongly believe that the North Abingdon site is deliverable with no insurmountable policy or technical constraints identified.
- We are committed to ensuring that the necessary infrastructure is in place to support development at North Abingdon. No 'showstoppers' in respect of infrastructure requirements have been identified, and we will work with infrastructure providers and the Council to secure the timely delivery of necessary supporting infrastructure.
- The North Abingdon site is considered to be generally viable, with the essential infrastructure identified in the current version of the IDP, the Strategic Site Development Templates, CIL as currently proposed and 35% on site affordable housing provision. However, this situation will need to be kept under review as masterplanning work is progressed, and cost estimates and

values are refined – and we therefore welcome the flexibility afforded in draft Core Policies 7 and 24.

- There appear to be some anomalies in the IDP – which need rectifying.
- It is intended that an outline application will be ready for submission upon adoption of the Local Plan (Part 1).

Please do let us know if you require any further information or clarification.

Yours faithfully



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APPENDICES

Appendix A – Site Ownership Plan

Appendix B –Representations in respect of the allocation of Land at North Abingdon in the Housing Delivery Update 2014

Appendix C – Opportunities and Constraints Plan

Appendix D – Representation Forms