Comment

Consultee	Mr Nick Mannering (729577)
Company / Organisation	RPS for Taylor Wimpey
Address	Mallams Court 18 Milton Park ABINGDON OX14 4RP
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	RPS for Taylor Wimpey (Mr Nick Mannering)
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Consultation Point	Core Policy 15: Spatial Strategy for South East Vale Sub-Area (View)
Status	Submitted
Submission Type	Email
Version	0.5
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

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities

Q3 Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

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.

5. 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.

Core Policy 15 ? Spatial Strategy for South East Vale Sub-Area

Why not legally compliant or unsound or fails to comply with duty to co-operate?

Core Policy 15 is unsound in as much that the reference to ?Valley Park? in the accompanying table of strategic development sites within the South East Vale Sub-Area, for delivery of housing during the plan period, refers to a housing supply figure of just ?2,550? dwellings. This figure conflicts with the VWHDC?s own evidence base, where Appendix B of Topic Paper 3 - Strategic Sites Selection ? applicable to Valley Park (Site Ref. TPS 056) states under the heading ?Site Selection Methodology (2014)?:- ?Assessment concluded that evidence work has tested a figure of 2,550. The local plan should provide for the delivery of ?at least? 2,550 homes to allow for an element of flexibility with the potential for additional development beyond 2031.?

Core Policy 15 also states that development at strategic allocations will be supported through a masterplanning process involving the community, local planning authority, developer and other stakeholders where they meet the requirements set out within the Development Site Templates shown by Appendix A and in accordance with policies of the Development Plan as a whole. The Site Template for Valley Park states under ?use? that the site can accommodate ?at least 2,550 homes, subject to masterplanning?; however, the aforementioned table within the main policy does not recognise that that the site can accommodate ?at least? 2,550 dwellings.

Even the VWHDC?s previous Housing Delivery Update version of the Local Plan (Consultation Draft, February 2014), read in conjunction with the Site Information Tables attached to Appendix 5, stated that Valley Park could accommodate 2,550 dwellings with potential for a further 575 after the year 2031 (and this excludes the Site Information Table?s assumptions about a further 1,025 dwellings that could be accommodated within the site towards the north-west: North West Valley Park). This results in the current Plan actually effectively reducing provision at Valley Park, when the evidence base and the scale of the site would suggest significantly more dwellings.

The Council is aware that the promoters of this allocation have been working closely with them on proposals for the site which will form the basis of a future outline planning application. This has involved extensive capacity-testing of the allocation area, and this has demonstrated that the site has capacity for significantly more than 2,550 dwellings. A public consultation exercise was undertaken in June 2014 on a scheme of around 4,000 dwellings on Valley Park (excluding North West Valley Park), and further work since then, in consultation with the Council and their design advisers, has resulted in a figure well in excess of 2,550. Our understanding from officers is that the figure of 2,550 has been included because this is the Council?s estimate of the number of dwellings that are likely to be delivered on the site within the Plan period. Whilst we accept that it is reasonable for the plan to make reference to the amount of housing that can be delivered during the plan period, to plan positively, and to ensure a comprehensive approach, with adequate infrastructure provision, there should be an acknowledgement that significantly more than 2,550 dwellings can be achieved on this site.

Consequently, Core Policy 15 is not ?justified? judged against Paragraph 182 of the NPPF.

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.

To make Core Policy 15 sound, in terms of being ?justified? against Paragraph 182 of the NPPF, the housing supply table incorporated within the policy should state the following number of dwellings for Valley Park, within the South East Vale Sub-Area:

"At least 2,550" (i.e. words "at least" should be added to this number of dwellings). It would also be more positive if a reference could be made to the fact that the site has significantly more capacity than 2,550, albeit some of this may fall outside the plan period. This will allow for a more comprehensive proposal for the site, with a better recognition of infrastructure provision.
This alteration would bring the policy in line with the Council?s evidence base, as well as in line with the Development Template to which the policy refers.

(Note that we make separate representations to the Site Development Template for Valley Park contained in Appendix A, as referred to by this policy).

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:

We represent the promoters of this site and it is important that we are able to explain the work that we have undertaken on capacity testing.