

## Comment

<b>Consultee</b>	Gary Lees (729128)
<b>Company / Organisation</b>	[REDACTED]
<b>Address</b>	4 The Courtyard Church Street Derbyshire DE74 2SL
<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Pegasus Planning Group ( Gary Lees)
<b>Comment ID</b>	LPPub4520
<b>Response Date</b>	29/01/15 12:39
<b>Consultation Point</b>	Core Policy 16: Didcot A Power Station ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Email
<b>Version</b>	0.9
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	No
<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.**

Core Policy 16 proposes the allocation of land at Didcot A Power Station to provide a high quality mixed-use development. In broad terms, the allocation of this site is supported, however amendments are needed to make the policy sound.

Pegasus group on behalf of Clowes Developments is currently preparing an outline planning application for the site, and it is envisaged that this application will be submitted early in 2015. Technical studies have been prepared in support of the planning application which demonstrate that the site is sustainable and deliverable. A design workshop has been undertaken with key stakeholder and a Design and Development Principles Document produced and agreed at Officer level; this is attached for information.

It is agreed that the site will provide for a mixed use development comprising residential, Class B1/B2/B8 employment units, Class A1 retail units, a Class C1 hotel and a Class A3/A4 pub/restaurant. The proposed development description for the forthcoming planning application is:

"Outline Planning Application for mixed use redevelopment comprising up to 400 dwellings, 110,000m<sup>2</sup> of Class B2/B8 units, 25,000m<sup>2</sup> of Class B1 units, 13,000m<sup>2</sup> Class A1 units ( includes 1,500m<sup>2</sup> convenience food store), 150 bed Class C1 hotel and 500m<sup>2</sup> of Class A3/A4 pub/restuarant, including related open space, landscaping,access and drainage infrastructure, together with that part of the proposed Science Bridge and related link road within the site."

As this is broadly agreed at Officer level it is important to ensure the policy allocation is formulated to not frustrate these redevelopment proposals. To ensure the policy is going to be effective and justified, amendments are required.

The reason why the policy is not presently effective or justified is as follows:

First, as part of our previous submissions we outlined our concerns in relation to the draft policy's emphasis on B1 uses. It was, and still is, considered that a more flexible approach to employment uses as part of a mix of uses is appropriate to comply with the NPPF and the achievement of sustainable development. It is disappointing that the emphasis on B1 use has not changed in the present draft policy and it therefore remains our submission that Core Policy 16 should be amended to allow for a more flexible approach to development at this site.

The NPPF at paragraph 21 states "Policies should be flexible enough to accomodate needs not anticipated in the plan and to allow a rapid response to changing circumstances." This approach is exemplified in the present policy approach at Milton Park, where the saved Local Plan Policy E5 allocates the site for B1, B2 and B8 uses with no emphasis on a particular use. There is no reason why a similiarly flexible approach could not be applied to the Didcot A site. It is also important to note that the agreed proposals at Officer level will not result in a scheme that is "predominantly B1" as the draft policy presently states.

Second, there is agreement at Officer level for the site to accomodate a retail park. Reference to bulky goods retailing in the policy is welcomed as this acknowledges the appropriateness of the site for retail park development in policy perms, having regard to Core Policy 32. However, this acknowledgement conflicts with the term "ancillary" in the policy wording and, as a result, makes the policy unclear and ineffective. As such, the inclusion of the word "ancillary" preceding the word "retail" in the policy is overly restrictive and would not facilitate the development proposals as formulated in agreement with Officers. It should therefore be deleted.

On a related matter, paragraph 4.36 of the Spatial Strategy requires amendment as this acknowledges the need to work closely with South Oxfordshire under the Duty to Cooperate to ensure the cumulative retail needs of Didcot are going to be met. At present, the paragraph considers this "can be delivered through the continued expansion of the Orchard Centre in the town centre and through the new district centre at Great Western Park."

Reference to the Didcot A Power Station site also delivering some of the wider Didcot area retail needs over the plan period is necessary to ensure that the Plan will be effective. It is thus suggested the following sentence be added to end of the paragraph: It is anticipated that bulky goods retailing that cannot be accomodated at these locations will be provided for as part of the mixed use development of Didcot A Power Station Site (Core Policy 16)

***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:**

Clowes Developments (UK) has interests in Didcot A Power Station (Core Policy 16) It is therefore important that they take part in the examination to address any issues in relation to the site should they feel that this is necessary.