

## Comment

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|---------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| Agent                                                                                                         | Mr Paul Butt (832055)                                                           |
| Email Address                                                                                                 |                                                                                 |
| Address                                                                                                       | 8 Hyde Copse<br>Marcham<br>OX13 6PT                                             |
| Consultee                                                                                                     | Mr Matthew Green (872801)                                                       |
| Company / Organisation                                                                                        | Green and Co c/o Community of St Mary the Virgin,<br>Wantage                    |
| Address                                                                                                       | Unknown<br>Unknown<br>Unknown                                                   |
| Event Name                                                                                                    | Vale of White Horse Local Plan 2031 Part One -<br>Publication                   |
| Comment by                                                                                                    | Green and Co c/o Community of St Mary the Virgin,<br>Wantage (Mr Matthew Green) |
| Comment ID                                                                                                    | LPPub1177                                                                       |
| Response Date                                                                                                 | 19/12/14 14:33                                                                  |
| Consultation Point                                                                                            | Core Policy 4: Meeting Our Housing Needs ( <a href="#">View</a><br>)            |
| Status                                                                                                        | Submitted                                                                       |
| Submission Type                                                                                               | Email                                                                           |
| Version                                                                                                       | 0.3                                                                             |
| 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.**

Paragraphs 83, 84 and 85 of the National Planning Policy Framework (the Framework) advise: '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); 'When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary' (paragraph 84); and 'When defining boundaries, local planning authorities should: ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; not include land which it is unnecessary to keep permanently open; where necessary, identify in their plans areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period; make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development; satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent' (paragraph 85). The Local Plan Core Policy 4 seeks to allocate a number of sites within the Green Belt for housing. In the event that the independent Inspector considers that the Local Plan is likely to be found unsound due to unmet housing needs, taking into account the advice in paragraphs 83 to 85 of the Framework or otherwise, a modification is sought to Core Policy 4 to include two sites in the ownership of the Community St Mary the Virgin (the CSMV) to the north and south of Challow Road, Wantage. Both sites lie within the built-up area of Wantage and measure approximately 6.41ha and 1.32ha respectively. These sites were the subject of Screening Opinions ref. P14/V1357/SCR (for up to 120 dwellings) and P14/V1358/SCR (for up to 40 dwellings) respectively, and on which the Local Planning Authority responded on the 4 July 2014 advising that the proposals did not amount to EIA development. Together these two sites within the CSMV ownership could provide up to up to approximately 160 dwellings within the built-up area of Wantage and in close proximity to the town centre. I note that the smallest strategic allocated housing site under Core Policy 4 is 200 dwellings (there are a number of allocations of this size). I also note that the Local Planning Authority are intending to produce a Local Plan 2031 Part 2: Detailed Policies and Local Sites that will allocate non-strategic development sites in which the Local Planning Authority, in addition to the strategic allocated housing sites identified in Core Policy 4, need to find 220 more dwellings in the South East Vale Sub-Area in which Wantage lies (through Part 2 allocations, Neighbourhood Plans or the Development Management process). Until then the saved policies of the current Local Plan 2011 will continue to apply for planning applications. A pre-application enquiry has been made for the CSMV south site ref. P14/V2038/PEJ, and it is intended that a pre-application enquiry for the CSMV north site will be made in due course. Whilst it is intended that the sites will be progressed through the Development Management process, it is recognised that up to approximately 160 dwellings on the two CSMV sites would not be far short of the smallest strategic allocated housing sites under Core Policy 4, and that 160 dwellings amounts to approximately 73% of the 220 more dwellings that the Local Plan 2031 Part 2 need to find in the South East Vale Sub-Area to meet the identified housing need. The modification to Core Policy 4 that is considered necessary in the event that the independent Inspector considers that the Local Plan is likely to be found unsound due to unmet housing needs, taking into account the advice in paragraphs 83 to 85 of the Framework or otherwise, is that the CSMV sites be allocated for housing development in the Local Plan Part 1 Strategic Sites and Policies. This would be rather than being considered in the Local Plan 2031 Part 2: Detailed Policies and Local Sites, through the emerging Neighbourhood Plan (see <http://www.wantageighbourhoodplan.org>), or through the Development Management process, the latter on a without prejudice basis to the current pre-application enquiry for the CSMV south site or the intended preapplication enquiry for the CSMV

north site in due course, or the intention that the sites will be progressed through the Development Management process.

**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.**

The modification to Core Policy 4 that is considered necessary in the event that the independent Inspector considers that the Local Plan is likely to be found unsound due to unmet housing needs, taking into account the advice in paragraphs 83 to 85 of the Framework or otherwise, is that the CSMV sites be allocated for housing development in the Local Plan Part 1 Strategic Sites and Policies. This would be rather than being considered in the Local Plan 2031 Part 2: Detailed Policies and Local Sites, through the emerging Neighbourhood Plan (see <http://www.wantageneighbourhoodplan.org>), or through the Development Management process, the latter on a without prejudice basis to the current pre-application enquiry for the CSMV south site or the intended preapplication enquiry for the CSMV north site in due course, or the intention that the sites will be progressed through the Development Management process.

***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?** No - I do not wish to participate at the oral examination