

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Green & Co ( )
Comment ID	LPPub800
Response Date	18/12/14 12:18
Consultation Point	Core Policy 4: Meeting Our Housing Needs ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.1
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)	Yes
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	North West of Abingdon-on-Thames

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.**

We support the Council's housing target for at least 20,560 homes to be delivered in the plan period between 2011 and 2031. This is in accordance with Oxfordshire Strategic Housing Market Assessment (April 2014), which identified a need for 1028 new homes per year to be delivered in the Vale of White Horse. Therefore, the Plan has sought to provide the delivery mechanism for the objectively assessed housing need with the District.

The Council's housing supply is made up of completions, planning applications with permission, site allocations, windfall sites, and also allocations through the future Local Plan Part 2. The NPPF in Paragraph 47 requires LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. They are also required to identify a supply of specific deliverable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15.

Core Policy 4 successfully achieves this by identifying where 18,660 new homes will be delivered, equating to 18 years housing land supply. Furthermore, it has identified a mechanism in which a further 1000 homes can be delivered through further site allocations in Part 2 of the plan. We therefore consider the Council's housing target and strategy for delivery to be robust and in accordance with the NPPF.

In addition, we also support the Council's inclusion of a footnote, which states that where housing is delivered through Neighbourhood Plans, this will be deducted from the Part 2 allocations. We agree to this flexible approach as it provides a means for housing to be delivered in both circumstances. This is not always the case as in other Local Plans, a set amount of housing numbers have been allocated to 'Neighbourhood Plans' as a whole, without a contingency plan should neighbourhood plans not be progressed.

The Policy continues that *'Development will be supported at strategic site allocations where they meet the requirements set out within the Development Site Templates shown by Appendix A'*. We have provided comments on Appendix A in the 'Local Plan 2031 Publication Version' section.

We support the inclusion of the Abingdon-on-Thames and Oxford Fringe Sub-Area, in particular the North West Abingdon-on-Thames strategic allocation. Our only concern is that the numbers allocated to each site appear fixed, where potential opportunities may exist in order to increase the numbers on-site. This would be particularly beneficial should there be a need for the Vale of White Horse to take some of the unmet need from neighbouring authorities. More detailed comments has been made at Core Policy 8.

**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 are acting on behalf of our client who has an interest in the North West Abingdon-on-Thames strategic allocation and as such, we request to participate in the EIP in order to support this site and other policies in the plan.