## **Gregory Gray Associates**

## CHARTERED TOWN PLANNING CONSULTANTS

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Planning Policy Vale of White Horse District Council Abbey House Abbey Close Abingdon OX14 3JE

11th November 2014

Our Ref:

Dear Sir/Madam.

## **VALE OF THE WHITE HORSE LOCAL PLAN 2031**

Gregory Gray Associates has previously submitted representations on behalf of our client, owners of Chilton Garden Centre, Newbury Road, Chilton in respect of earlier consultations relating to the above document. A copy of our most recent letter dated 25th March 2014 is attached. It sets out my client's position with regard to the suitability of their site for allocation for housing or employment purposes within the emerging Local Plan.

Chilton Garden Centre comprises 'previously developed land' which is located immediately to the south of the greenfield housing allocation identified in the Local Plan as Land East of Harwell Campus. The proximity of the site to the proposed allocation is evidenced by the fact that its road frontage is identified as 'safeguarded land' required to provide alterations to the strategic highway network in order to serve the new development.

Our previous comments identified how the allocation of Chilton Garden Centre for housing or alternative commercial purposes would provide a sustainable option for accommodating new development within this environmentally sensitive part of the District over the Plan period, and it was requested that Chilton Garden Centre be included as part of the strategic allocation to the East of the Harwell Oxford Campus or as a complementary commercial allocation.

It is noted that the final consultation draft of the Local Plan makes various changes to the proposed allocations in order to address concerns received in response to the Housing Delivery Update to the Local Plan (to which our comments of 25<sup>th</sup> March 2014 refer) about the amount of development proposed within the Green Belt and the AONB.

Whilst it is noted that the allocation for the Land East of Harwell Campus has decreased from 1400 to 850 units, I am concerned to note that no attempt has been made to reassess the merits of my client's site to make a contribution towards either the housing or employment

needs of the area. The Council has recognised that the land's Green Belt and AONB designation requires careful consideration of the level of housing proposed and yet has not fully explored the use of an adjacent, brownfield site to meet identified housing and employment needs.

As stated in our previous correspondence, the principles of sustainable development set out in the NPPF seek a prudent use of natural resources through the effective use of land by encouraging the re-use of previously developed sites (para. 17). It is a fundamental tenet of Government policy that, subject to consideration of any environmental constraints, the use of 'brownfield' sites should be prioritised over Greenfield ones.

As set out in our letter of 25<sup>th</sup> March 2104, Chilton Garden Centre is a highly developed, 'brownfield' site, currently occupied by large retail glasshouses, canopies, a plant display area and car parking. There is the potential to redevelop the site for alternative purposes, without having any additional impact upon the openness or character of the site or surrounding area either in terms of the built form or the level of activity and traffic generation associated with the new use.

It is considered that the Council's failure to consider the merits of our client's brownfield site in preference to the adjacent greenfield alternative renders the current Local Plan as 'unsound' by virtue of it not being the most appropriate strategy when considered against reasonable alternatives and being inconsistent with national policy.

It is requested that these comments be passed to the Inspector who, during the course of the Examination of the Local Plan, is requested to assess the appropriateness of including Chilton Garden Centre as part of the Land East of Harwell Campus Allocation or as a complementary employment site.

Yours faithfully

Joanna Male cc Client