

## Comment

Consultee	Mrs Susan Davidson (829945)
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Address	51 Hurst Lane Oxford OX2 9PR
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mrs Susan Davidson
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**Q1 Do you consider the Local Plan is Legally Compliant?** No

**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

**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.**

The classification method of larger and smaller villages is flawed.

The Vale's classification is based on its own Town and Village Facilities Study which simply counts facilities of each village without qualification as to capacity etc. For example, a village gets a set number of 'sustainability marks' for having a school even though that school may be heavily over-subscribed or operating out of porta-cabins, as it is in Cumnor.

Furthermore, material factors affecting classification are outside the Vale's control, such as a Post Office or community library closing in a village, or a bus route being withdrawn. Closure of facilities, as is the trend, alters a village's 'sustainability marks'. A village with over 14 marks is classed 'large'

and a village with 7-13 marks is 'small', so these factors are material and the classification method is flawed.

For example, if the 'marks' for a 'Larger Village' falls to a level commensurate with those of a 'Smaller Village' then there must be a re-classification to 'Smaller Village'. Otherwise, by the Vale's own contention, placing the same levels of development there is no longer sustainable.

In addition, within the 'large' category there is a vast difference in the size, character and facilities of each village. One only needs to look at a local area map to see a substantial difference between villages within the same classification. For example, Cumnor has more in common with Appleton than with Kennington, yet Cumnor and Kennington have the same classification, whereas Appleton does not.

This approach is self-evidently flawed, and inadequate as a basis for assessing sustainability.

**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.**

There is no alternative but to do a fresh comprehensive and vigorous sustainability assessment, and base policy on it.

**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