

## Comment

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<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Mrs Susan Davidson
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<b>Version</b>	0.1
<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.**

It is unsound to conceive of Botley as a town centre, and its proposed role as such in the Local Plan is unjustified and excessive.

Being conveniently close to Oxford, there is no reason Botley would be considered a 'destination' as it cannot, and should not, compete with Oxford, a city. Botley is described in the Local Plan as a 'local service centre' and should be just that, i.e. a centre to serve local people. A local service centre is by definition not a destination, nor should be expected to have facilities of a town centre. Botley neither naturally performs as a town centre nor provides the range of services and other facilities that would

be expected of a town centre, which are already adequately provided in Oxford centre 1.74 miles away. Rather, Botley serves the local community.

Botley is a neighbourhood within the Vale on the boundary edge of Oxford. One of five arterial roads out of Oxford is the Botley Road, which starts at Oxford Railway Station and leads directly to Botley (after 1.43 miles). The retail shops and services at Botley precinct and Elms Parade provide much used and valued local independent shopping units, and a good range of core services, such as pharmacy, PO, banking, dentist, optician etc

Elms Parade (the shops at West Way, Botley) is 1.74 miles from Oxford City Centre, (Westgate Centre/Bonn Sq). Oxford already has the facilities one would expect of a town or city, and Oxford is a city. There is are frequent bus services between Elms Parade to Oxford (Westgate Centre) along the Botley Road.

On Botley Road, within a mile of Elms Parade, there are large retail outlets, and development of a new Waitrose food store and 150 car parking spaces has commenced. Between this new Waitrose and Elms Parade is an Aldi food store on one of the retail parks.

The plan (Fig 5.3) called 'Botley central area' is a significant exaggeration of what locally is known as Botley shops (essentially the Precinct and Elms Parade). The area in fig 5.3 is more extensive as it includes nearby sheltered housing and church. This area resembles redevelopment proposals to accommodate an oversize food superstore and a contra-indicated 6 screen cinema. Those proposals have already received extensive and varied objection, chiefly due to size, scale, and loss of valued small independent shops and services.

A 6 screen cinema is contra-indicated in the Vale's own study (Chapter 5 Retail & Town Centre Study) which only identifies the possible potential for 1 .9 screens max within the District over the Plan period and concludes that 'cinema may not be viable because of facilities outside the Vale'. Oxford alone already has three multi-screen cinemas in the city centre (1.75 miles from Elms Parade).

5.4 The analysis above suggests that there could be a requirement for two screens and around 400 seats, to meet future cinema demand in the District. However, given the proximity and availability of cinemas in the nearby centres of Oxford, Didcot and Swindon, this may mean that a small cinema within the District would not be a commercially viable option. It should be noted that this a very high level assessment, and a more detailed commercial viability assessment would need to be undertaken by developers to demonstrate whether a cinema would be viable within the District?

The floorspace of this proposed development exceeds the projected convenience need identified for the Local Plan Period in the Vale's own study (para 4.17 Retail & Town Centre Study Addendum) to the extent that there is no need to plan for additional development over the Plan period. Bearing in mind these retail calculations are based on unsound housing projections, this is significant.

This Retail and Town Centre Study Addendum has been prepared on behalf of Vale of White Horse (VOWH) District Council to provide a review of the implications of the additional housing requirements that have been identified for the District, and the likely associated changes in the retail floorspace needs arising from the revised population figures. This Addendum should be read alongside the Retail and Town Centre Study produced by NLP in March 2013.

4.17 The proposed redevelopment of the Westway Shopping Centre and the Seacourt Tower Retail Park will more than meet the convenience and comparison goods floorspace requirements for Botley over the Plan period, and address the existing deficiency in retail and leisure provision for local residents. There is no requirement to plan for additional development over the Plan period, and the implementation of the Seacourt Tower Retail Park development could help to absorb some of the identified comparison goods floorspace needs elsewhere in the District, including Abingdon-on-Thames.

**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.**

Redefine (substantially reduce from what is currently proposed by developers) the size and scale (height, length, width, density) to ensure it is in keeping with the proportion of its locale, and its designation as a local service centre.

Qualify the phrase 'effective use of development potential' so as to avoid it amounting to permission for cramming by density and height.

Uses should be specified to include only current uses. This is solely where there is a demonstrated need, as a local service centre.

**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