

Comment

Consultee	Mr Ken Dijksman (404457)
Email Address	dijksman@msn.com
Company / Organisation	Dijkman Planning LLP
Address	35 Berkeley Road Newbury RG14 5JY
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dijkman Planning LLP (Mr Ken Dijksman)
Comment ID	LPPub2390
Response Date	14/01/15 16:30
Consultation Point	Core Policy 15: Spatial Strategy for South East Vale Sub-Area (View)
Status	Submitted
Submission Type	Email
Version	0.11
Files	2748 Concept Layout REV A SK04 1.pdf

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? No

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.

Proposed housing allocations within Greenbelt and AONB Of specific relevance to the Soundness of the plan is a Core Planning Principle within Paragraph 17 of the NPPF: 'Allocations of Land for Development should prefer land of lesser environmental value, where consistent with other policies in this framework.' This core principle establishes with clarity that site allocation should be comparatively assessed. In paragraph 82 of the NPPF it is made clear that 'Once established greenbelt boundaries should only be altered in exceptional circumstances'. In paragraph 115 of the NPPF the importance of the landscape of the Areas of Outstanding Natural is confirmed as having the highest possible status of protection, in National terms.

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:

The Land at east Challow constitutes a significantly more sustainable and deliverable proposal than those allocated in more sensitive and less sustainable locations elsewhere (sites 1,2,3,4 12 & 13). The overall Soundness of the plan is compromised by: 1. the lack of acceptance that unmet housing need increases the quantum of 5 year land supply, 2. by allocations with Green Belt and AONB locations when sustainable alternatives are demonstrably available 3. Reliance upon an artificial 'ring fence' related to housing delivery through major allocations, a mechanism that is considered necessary because their deliverability is in doubt. These three issues render the plan unsound and contrary to Government Policy. These matters require open debate and discussion as do the merits of the site at East Challow which is being proposed as a way of helping to establish a Sound Plan.