

**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title

Mr

First Name

Craig

Last Name

Dunphy

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

12 The Styles

Line 2

Harwell

Line 3

Line 4

Post Code

OX11 0HX

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	X	No	
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	X
4 (3) Complies with the Duty to co-operate	Yes	X	No	

Please mark as appropriate.

5. 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.

In the case of Harwell Village, the Plan has no effective mechanisms to deliver the aim stated in Section 5.57 that: “The countryside and villages will have maintained their distinctive character. The Larger Villages will have retained their separate identities.....”. Nor does it have an effective mechanism to deliver point (ii) of CP 44 for Harwell Village, which sets out to ‘protect from harmful development important landscape settings of settlements’.

The issue is that there is nothing specific anywhere in the Plan which defines unambiguously and unsubjectively what constitutes ‘maintenance of distinctive character/separate identity for Harwell village’, particularly on its east side with encroachment by Valley Park.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

To make Section 5.57 and Core Policy 44 of the Local Plan sound, the Plan must now identify a rural gap right around Harwell Village where no development will be permitted. This particularly applies to the approach to Harwell from the east, but is not confined to this direction.

On the east side the template for Valley Park in Appendix A should include a commitment to a green corridor along the B4493 between the A34 and Zulu Farm, to preserve some vestige of a green gap between the village and Didcot.

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.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☒ X

No, I do not wish to participate at the oral examination

☐

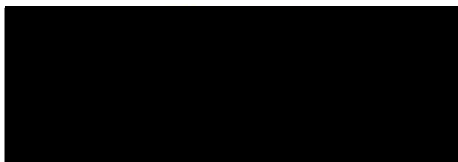
Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

I am willing for my concerns to be represented by the Keep Harwell Rural Campaign.

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.

Signature:



Date:

19/12/14



**Vale
of White Horse**
District Council

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First Name

Craig

Last Name

Dunphy

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

12 The Styles

Line 2

Harwell

Line 3

Line 4

Post Code

OX11 0HX

Telephone Number

07920 118678

E-mail Address

(where relevant)

denzil.dunphy@gmail.com

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

**Core
Policies 4
& 5**

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

X

No

Please mark as appropriate.

5. 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.

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Core Policy 4 for meeting housing needs and Core Policy 5 that flows from it are based on the Strategic Housing Market Assessment for Oxfordshire (SHMA). The SHMA has been criticised by many people, but particularly by the CPRE based on a report commissioned by them from Professor Alan Wenban-Smith. The detailed issues are very technical in a way that is beyond ordinary members of the public, but there appear to be serious grounds for questioning the figures, especially when they have led to such a large increase in the prediction of the number of houses required, seemingly driven by a large increase in the predicted number of new jobs in the area. Until these criticisms have been objectively assessed the policy must be considered unsound. Certainly some of the numbers from the SHMA seem to be unrealistic.

(continue on a separate sheet/expand box if necessary)

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To make Core Policies 4 and 5 sound they must have a housing needs basis that has been more critically examined than the SHMA, and has addressed the criticisms of the CPRE report. The numbers and sites from the 2013 draft Local Plan should replace those in this version. Even if higher numbers are confirmed as the most reliable forecast, there should still be a mechanism for adjusting the plans should reality not match up to the forecast, or if infrastructure to cope with the large increase in housing cannot be delivered.

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.

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Signature:

[Redacted Signature]

Date:

DATE 19/12/14