

Comment

Consultee	Miss Alexandra Holroyd (872823)
Email Address	[REDACTED]
Address	6 Norfolk Close Radley OX14 3BH OX14 3BH
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Miss Alexandra Holroyd
Comment ID	LPPub1212
Response Date	19/12/14 16:04
Consultation Point	Local Plan 2031 Publication Version (View)
Status	Submitted
Submission Type	Web
Version	0.1

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

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.

Re Core Policy 2 :In this policy it is stated that cooperation with other Oxfordshire Authorities will include a full strategic review of the whole of the Oxford green belt.

This is somewhat inconsistent as the Vale has just carried out their own review and it raises the possibility of a succession of reviews every time a new housing needs assessment is produced.

In the National Planning Policy Framework(NPPF) it is made clear that a green belt boundary should only be altered in ? exceptional circumstances ? .

In the Government guidance dated 6th March 2014 it states that ? Unmet housing need is unlikely to outweigh the harm to the green belt and other harm to constitute the ? very exceptional circumstances ? justifying inappropriate development on a site within the green belt ? .

Powered by Objective Online 4.2 - page 1

Re Core Policy 4:

This policy sets out the housing target based on the Oxfordshire strategic housing market assessment (SHMA). There are two objections. 1. The SHMA is based on employment forecasts that are wildly optimistic and which have not been challenged, scrutinised or validated in any way by the Vale Council.

2. The SHMA itself states that it should only be a starting point for the determination of housing need. Environmental, social and infrastructure constraints should be taken into account as an integral part of this which has just not been the case. There are many issues to consider with possibly the two main ones being.

1 About 500 Radley residents responded in April using our standard letter. These were all considered as one objection, despite assurances from Council Leader Matthew Barber on 4th April that they would be considered individually. How can this possibly be right that at a stroke the views of 500 people are disregarded?

1 The Vale now admit that there were problems with their website. We can't know if any comments were lost as a result but an extension was granted to key landowner Radley College, whose response is dated 11/04/2014 a full week after the close. No such extension was offered to the public. The inequality of this is astounding.

Re Core Policy 7 :

This policy relates to infrastructure provision. Any concerns as to the lack of adequate infrastructure should be related to this policy. Existing infrastructure that includes such items as the road network, primary and secondary schools, doctors surgeries and dentists, hospitals, bus services etc are just about coping now. Not to deal with these issues at the start of any mass development of this area would be a disaster for all who already live here.

Core Policy 13 :

This is the same as for Core Policy 2 above. It is inconsistent with the Vale having carried out their own review and it would seem to raise the possibility of a succession of reviews each time a new housing needs assessment is produced.

To state it again the National Planning Policy Framework(NPPF) makes it clear that a green belt boundary should only be altered in ? exceptional circumstances ? and the Government guidance dated 6 th March 2014 states that ? Unmet housing need is unlikely to outweigh the harm to the green belt and other harm to constitute the ? very exceptional circumstances ? justifying inappropriate development on a site within the green belt ? .

In addition, the extension of the North Abingdon site east of Oxford Road into land that comprises Peachcroft Farm was included in the document prepared for consultation in April of this year.

In the Vale green belt review of February 2014 it did not recommend that this area was withdrawn from the green belt.

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.

The whole process fails in a fundamental way in its duty to co-operate. The process has to date been undemocratic in that it has failed to allow the views of the community to be heard and to disregard its view when it does object as follows: Given the magnitude of what is being proposed this is completely unacceptable.

Powered by Objective Online 4.2 - page 2

1. the timescale to make any comment or objection and to complete the form, being in the run up to Christmas, makes it difficult to complete in the available time given the difficulty given the demands on people's time at this time of year;
2. the issues are expressed by the Vale in a complex form that makes it inaccessible to a significant proportion of our community;
3. the online registration process is unclear before even filling in this form. This will exclude many in our community;
4. the on line form is difficult to use and fill in with a fair degree of expertise being required to enable the form to be completed. Again this will make it inaccessible to many in our community;
5. not every one has a computer or the expertise needed to make the on line representation that first requires individual registration. If a paper copy has to be used these have not been provided by the Vale and have to be first downloaded from their web site;
6. the paper copy is not straight forward to complete with on guidance given on how to complete it. A number of separate pages of part ? B ? being required should more than one point need to be made.
7. the paper copy of the representation form states that it should be delivered to Planning Policy at the District Council at their office in Wallingford. This is no good if you live in Radley and wish to have a receipt! A good proportion of the village will not be able to get to Wallingford and again this will exclude many in the community from being able to express their views;
8. a detailed knowledge of the local plan is required that will exclude many in the community from being able to express their views;
9. the manner in which the first round of the consultation was undertaken and the means employed to disregard the views of hundreds of people in Radley gives little faith that the same will not happen again.

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