

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Radley College & Kibswell Homes Radley College & Kibswell Homes
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Consultation Point	Core Policy 4: Meeting Our Housing Needs (View)
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Files	741289 LPPub.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)	Yes
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? Yes

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.

Is the Plan justified?

2.4.9 For a Plan to be justified, it must represent the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence. Essentially this means that the Plan should be based on a robust and credible evidence base³ involving: ? Research/fact finding: the choices in the Plan are backed up by facts. ? Evidence of participation of the local community and others having a stake in the area; and ? Provision of the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

2.4.10 The Freeholder submits that policy CP4 is justified and supports the proposed strategic allocations at North West Radley in principle, subject to working with the local community on optimising development and the careful consideration of an increased allocation area to include the now omitted site at North Radley (Section 3 refers). The College and KHL note that the Green Belt Review did not explicitly recommend the North Radley site for release from the Green Belt but acknowledge that ultimately, it is the role of the Council to carry out amendments to the Green Belt boundary and to balance release of sites from the Green Belt with other sustainability objectives. The Sustainability Appraisal (SA) 4 concludes that the North West Radley site performs very well against the identified SA objectives; it should be noted that the Interim Sustainability Appraisal (ISA) of February 2014 revealed that the North Radley site also performed very well in this respect, with only a minor negative scoring on two of the SA objectives (reduction in air, noise and light pollution and reduction in greenhouse gas emissions and resource efficiency) that could readily be addressed as part of the masterplanning process and mitigated as necessary. The proposed allocation at North West Radley is considered entirely appropriate given its clear sustainability credentials however the Freeholder suggests that further, close consideration of an expanded allocation to include the North Radley site must be undertaken given the clear potential for this approach to maximise the level of community gain that could be delivered if this option is pursued.

2.4.11 In terms of whether the approach to housing growth enshrined in CP4 represents the most appropriate strategy, given the scale of the additional housing growth required and in particular the number required within the first five years, the approach taken appears entirely appropriate. Given the need to ensure the overall deliverability of the housing target, the Council's strategy is to allocate smaller strategic sites across a number of settlements in order to complement the larger urban extensions. The Freeholder supports the Council's position that the preferred spatial strategy is the only reasonable alternative at this stage if it is to meet the objectively assessed housing need identified through the SHMA, and interlinked with this, the Council's apparent commitment to revisiting the degree of housing required across the VoWH in the future, in light of the evidence that has come to light in respect of Oxford City's unmet need.

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