



**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	Gordon	
Last Name	Stokes	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	58 The Glebe	
Line 2	Cumnor	
Line 3	Oxford	
Line 4		
Post Code	OX2 9QB	
Telephone Number		
E-mail Address (where relevant)		

Part B – (1 Core Policy 1)

Name or Organisation : Gordon Stokes

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	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="Unsound"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

There can be no 'presumption of sustainable development' given the evidence on which the plan is based, in particular the very high forecasts of housing 'need' from the SHMA which are used as targets in the document. The SHMA itself is unsound, relying on the Oxfordshire Strategic Economic Plan for its economic baseline. That document forms little more than a wish list for economic growth and has not been the subject of public consultation or scrutiny. It amounts to 'aspirational employment growth' figures which have not been rigorously tested.

Far more weight is given to economic sustainability than social or environmental, and writing on economic sustainability seems to follow a logic of "if developers are happy to build it then they must consider it to be sustainable".

Given the ambiguous wording of many later policies, the notion that "*Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant planning permission unless material considerations indicate otherwise ...*" would seem to provide much more a free for all for development than a Plan Led policy. This will do little to enable VOWH to "*take control of our planning system at the earliest possible opportunity ...*" which was their aspiration in evidence to the CLG Select Committee on the operation of the NPPF.

(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.

Core Policy 1 should be re-written to be more specific about what does and what does not count as sustainable development, and should have more to enable the Council to reject unsustainable proposals.

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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:

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Signature:

Date:

17 Dec 2014

Part B (2 Core Policy 4)

Name or Organisation : Gordon Stokes

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	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input type="text" value="Unsound"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="text" value="X"/>

Please mark as appropriate.

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The housing allocations have used a flawed SHMA as *targets* for housing development rather than using a sensible forecasting methodology as a *starting point for cross boundary discussions* between the 5 Oxfordshire Districts (and those bordering outside the County). It is flawed in that it:-

- Used almost certainly over-optimistic assumptions for economic growth, taken from the LEP (who's aim is to boost economic activity rather than accurately forecast). Taken together I understand that LEP forecasts across the country predict an average growth rate similar to China's recent history – that may be an exaggeration but probably not much;
- It uses assumptions in terms of household size and levels of migration that have not been tested and are higher than other forecasts;
- Makes tenuous arguments about how housing affordability would improve on the basis of more house building rather than analysis of the market of buyers, use as second homes, homes for rent etc.

The SHMA states that it is a starting point for discussion, while VOWH used its figures for the draft Local Plan (February 2014) before SHMA publication, and has not had cross boundary discussions in terms of issues such as Oxford Green Belt policy.

The result is a freeing up of land for development (over which the Council will have little control in terms of what is built) that will allow, certainly in its early years, a situation where developers will be able to 'cherry pick' sites that are easiest and cheapest to develop. Builders' preferences for Greenfield sites over brownfield will lead to an unplanned situation where infrastructure to support the housing is not there.

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

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The SHMA forecasts should be critically reviewed and adjusted, followed by cross boundary discussions of what sensible forecasts should be, and how future growth should be accommodated, both

- spatially, in terms of how sites relate to realistic expectations of where employment will grow, and what infrastructure could be in place to support the proposed housing, and
- over time, in terms of which parcels of land should be made available such that housing growth can be integrated with transport networks, and other infrastructure.

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Signature:

Date:

17 Dec 2014

Part B (3 Core Policy 7)

Name or Organisation : Gordon Stokes

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

Paragraph Policy Proposals Map

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Yes	<input type="text"/>	No	<input type="text"/>
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4.(2) Sound (Positively Prepared, Effective and Justified)

Yes	<input type="text"/>	No	<input type="text" value="Unsound"/>
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Yes	<input type="text"/>	No	<input type="text"/>
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The infrastructure plans are poorly co-ordinated with development expectations. The local transport infrastructure is inadequate to deal with the *current* demands placed upon it, and there is little proposed that will ameliorate this, let alone compensate for the anticipated expansion of population.

- The A34 is currently running over capacity, with major hold-ups occurring regularly at peak times, or at any time due to something as inconsequential as a broken down vehicle. The current likely measures to ameliorate the situation (junction improvements) will simply serve to increase the flow of vehicles onto an already congested road.
- Even larger scale efforts, such as widening the road to three lanes would involve a new route around Oxford, and would take at least 10 years to come to fruition. There would still be traffic problems given if the expected economic and population growth were to materialise. Probably about 25% of A34 traffic (on any one link) is going all the way through the County, compared with 75% that is making local journeys.
- Public transport and cycling links are also currently inadequate in terms of providing an alternative, and there are no plans in the Infrastructure Delivery Plan that will make a difference. Railway stations are not placed that can reduce road traffic significantly (with none of the major VOWH settlements having railway stations), and deregulated bus services cannot be steered to pre-emptively provide alternatives. Most of the planned housing will be of a scale that would not provide enough housing to make any new or improved bus services viable.

In a similar way the general housing allocations would not make enough difference to enable schools to expand in the step sizes required (adding a new stream for each year).

The experience of the Great Western Park on the edge of Didcot just over the border to South Oxfordshire is an example of how delays in infrastructure provision can be damaging.

The suggested S106 CIL transport contributions are dominated by contributions to general road improvements, most of which would have little effect on the transport problems faced by resident of the

settlements affected. The "Overview of infrastructure in Abingdon-on-Thames and Oxford Fringe by 2031..." on p11 and p12 of the Infrastructure Delivery Strategy is woefully inadequate, with nothing that will compensate for the extra housing development. If the comprehensive redevelopment of Botley centre were to go ahead as planned it would be even more inadequate, leading to serious and severe congestion for much of the day.

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

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It is essential that serious thought is given to infrastructure provision *before* allocating land for housing.

The notion of a Garden City (as envisaged by Ebenezer Howard, with *employment and transport* infrastructure integrated into the design, rather than the current popular notion of 'eco-suburbs') should be given serious thought, with the reservoir site between Steventon and East Hanney as a location. I understand that this is being held till 2019 in case Thames Water require it, but this should not stop it being considered for a potential Garden City now, with a potential go-ahead given soon after 2019.

If built, such a Garden City could reduce the need for the current plans for large suburbs on the edge of Didcot and in AONB land near to Harwell. While it might not contain enough employment opportunities within its boundaries for the whole population it could have a railway station with links to Didcot, Oxford, Swindon, Reading and London, and would be large enough for a high frequency bus service to Harwell, Rutherford and Milton Park employment sites (the sites where most employment growth is envisaged)

The Infrastructure Delivery Plan should be re-written to provide more spend on public transport, walking and cycling improvements.

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Signature:

Date:

17 Dec 2014

Part B (4 Core Policy 11)

Name or Organisation :Gordon Stokes

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	<input type="text"/>	No	<input type="text"/>
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4.(2) Sound (Positively Prepared, Effective and Justified)

Yes	<input type="text"/>	No	<input type="text" value="Unsound"/>
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4 (3) Complies with the Duty to co-operate

Yes	<input type="text"/>	No	<input type="text"/>
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Botley Central Area policies appear to have been built around a specific development proposal which the VOWH was promoting and stood to gain from financially. That the Local Plan, using the wording it does, has been based on this proposed development is apparent both in the text relating to Botley's function, and in the boundary line used to define it.

Botley is described as being a centre of the same importance as Faringdon, but serving a much lesser function in terms of its retail characteristics, implying it needs to grow. This analogy is disingenuous since while Botley is a suburban area and its shopping centre serves the local area of Botley and Cumnor, Faringdon is a market town serving a very wide rural catchment with no other similar sized settlements for some miles, with a much greater need for first order facilities and services. Botley on the other hand is less than two miles from Oxford City Centre, and very close to a large retail area (Botley Road). That a large proportion of Botley residents use other centres for any 'main food shop' that they do does not mean that Botley needs to develop as a 'town centre' (in the say that Abingdon, Wantage or Faringdon could be described).

The boundary used for the centre is not what can be described as the functional centre (or CBD), but is *exactly* that proposed for development in a planning application (P13/V2733/FUL). That boundary includes a Baptist church but not the CoE church which is more central. But it includes the vicarage for that church which is more distant from the shops than the church itself. It includes sheltered housing even more peripheral. But is excludes a bank and office buildings that are very central.

A pub and two shops on the other side of West Way are excluded. This may make sense and could be based on the idea that the central area should be one side of the road. The anomalies on the shopping centre side are simply ridiculous. The definition of a centre must accord to the functional CBD, rather than an area according with a single planning proposal.

Moreover it seems almost certain that this boundary was defined in close discussion with the developers. A letter dated August 2012 sent from the developers agent to VOWH planners discusses

sending a site plan as an "aide-memoire" and how it was hoped that this might help "inform Local Plan discussions" as well as CPO issues. Correspondence released through FOI requests by West Way Community Concern provides further evidence that the developers unduly influenced the boundary. This influence most likely extends to the text which talks of 'comprehensive redevelopment' whereas the proposals consulted on in 2012 by VOWH were for complete redevelopment of around one third of the site, and refurbishment of the 1960s centre.

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

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Text should be adapted to

5.17. The main shopping centre in Botley is known as West Way. Although popular, offering a range of shops and services including restaurants and a library, the age and condition of the 1960s buildings detract from the centre's appearance. Elms Parade is functionally part of the West Way centre and includes a number of independent shops. Proposals for the refurbishment of Botley's central area, including the West Way Shopping Centre and Elms Parade, will be supported in accordance with **Core Policy 11**.

Deleted: its

Deleted: located in close proximity to the

5.28. The West Way shopping centre is a 1960s, part-covered shopping centre that, along with Elms Parade, which contains a number of small independent shops forms the main shopping area in Botley. This shopping area has served Botley well over the years but the West Way centre is now in need of refurbishment to fulfil its potential as a local service centre.

Deleted:

Deleted: The West Way centre is located to the rear of Elms Parade, which contains a number of small independent shops

5.29. The most recent Retail and Town Centre Study⁴⁸ identifies that Botley is a similar size in terms of retail units and floorspace to the market town of Faringdon. But, being functionally a suburb of Oxford rather than a freestanding town with a large rural hinterland, it does not need to provide the range of services and other facilities that would be expected. There is a high level of local retail and leisure demand being met by services and facilities within the city of Oxford and so outside the District.

Deleted: Despite this, it does not perform

Deleted: as a town centre and

5.30. The Retail and Town Centre Study identifies that around 25% of residents in the Botley retail catchment area do their main food shopping in the immediate area, with the majority travelling to peripheral Oxford supermarkets and Abingdon. The provision of a larger supermarket in Botley might address this imbalance. The study also notes that the provision of leisure and entertainment facilities, other than restaurants and pubs, is limited in Botley. Redevelopment of the area could therefore include small scale commercial leisure facilities, thereby helping to improve the overall offer and appeal of Botley as a centre for the residents of its natural catchment.

Deleted: at

Deleted: Botley also functions as a district centre in the Oxford City context.

Deleted: convenience

Deleted: into the city of Oxford

Deleted: food superstore

Deleted: would

5.31. Redevelopment of the central area could provide a larger supermarket, shops, offices, and other uses to meet the needs of Botley and the local area. **Core Policy 11** therefore supports proposals for some redevelopment within the Botley central area (**Figure 5.3**), which includes the West Way Shopping Centre and Elms Parade.

Deleted: shopping and leisure destination

Deleted: hotel, car parking

Deleted: surrounding

The map of the Central area should be amended to reflect the functional area of the centre.

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Deleted: of

Core Policy 11 suggested text alterations:-

Proposals for ~~a comprehensive retail-led redevelopment and upgrading of Botley central area, as defined on the Adopted Policies Map,~~ will be supported provided that:

taken as a whole, the proposals support the role and function of Botley as a local service centre, providing a well-integrated mix of shops and services to meet day-to-day shopping needs of the local area

~~effective use is made of development potential above ground level and on more peripheral parts of the~~

site for a mix of uses that may include, but are not limited to, office, community, residential, hotel and leisure activities
existing community facilities, including the community hall, library and Baptist Church are replaced **(if demolished)** with facilities of an appropriate size and quality to meet current and likely future local needs
it can be demonstrated that proposals will not harm the character or appearance of the local area, particularly West Way, Arthray Way and Westminster Way
proposals for the site are prepared through a comprehensive **and transparent** masterplanning process **working with the community to provide** providing an integrated solution to site access, traffic management, air quality management, servicing and sufficient car parking whilst prioritising the pedestrian customer environment, and
proposals that seek to demolish Elms Parade should demonstrate that its successor is of at least equal architectural merit and particular attention should be given to provide at least the same level of active frontage should take account of the status of Elms Parade as a non-designated heritage asset.

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NO

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Signature:

Date:

17 Dec 2014

Part B (5 Core Policy 13)

Name or Organisation : Gordon Stokes

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

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

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Yes	<input type="text"/>	No	<input type="text"/>
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Yes	<input type="text"/>	No	<input type="text" value="Unsound"/>
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The policies relating to both the Green Belt and AONB housing allocations are unsound. The proposals for large scale housing close to Didcot and Harwell are also not well thought out.

Green Belt

- The allocations have not been thought out with any attention to detail. The process gave the impression of a hurried attempt to allocate a large number of sites, with the only proviso being that most were on the edge of settlements. Indications from a public meeting in Faringdon related to the plan (December 2014) gave the impression that the aim was for the Green Belt to 'take its fair share of growth' to appease those outside the Green Belt.
- Recent government guidance (letters from Nick Boles, March 2014 and latest NPPG) has been clear that the Green Belt is only to be breached in 'exceptional circumstances' and that a general housing shortfall is not 'exceptional'. New NPPG is even more specific that these are not exceptional circumstances
- Consideration of the Oxford Green Belt should be carried out with all 5 District Councils taking equal part, and if it felt that Oxford needs to expand (which seems accepted, though the infrastructure issues and how Oxford would function without extra space at its centre not thought through) then locations should be jointly agreed and properly planned.
- Any expansion of villages within the green belt should be solely to accommodate natural growth, and this (in nearly all cases) could be managed within the existing Green Belt 'islands' preferably through social and truly affordable housing. If this is not possible then land to accommodate natural growth could be allocated to allow a maximum of, say, 15% growth in homes over the 17 year period to 2031, freed up incrementally to stop larger estates being built.
- Of the areas designated to be 'released' from the village of Cumnor, 2 (Sites 4 and 5) were dismissed from the February 2014 review as being unsuitable

AONB

- The proposals for 1400 houses in the AONB are difficult to comprehend. Proximity to Harwell is not a reason for such a massive amount of housing.

Large scale housing close to Didcot

- These proposals basically amount to an expansion of the suburbs of Didcot, in an area that will encourage use of the A34 for travel, being some distance from Didcot centre.
- It will not be in a location that will enable good public transport use to employment or other centres since, although large, it is not large enough to support bus services to the range of destination that would be needed (Milton Park, Didcot centre, Harwell etc).
- For this scale of housing and the relationship to the Vale Science Park proposals (if successful) the notion of a Garden City on the reservoir site would make much more sense (see my Core Policy 7 comments)

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

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The sites in the Oxford Green Belt and AONB that have been identified for housing should be withdrawn from the Plan and the total programme reduced accordingly.

A full joint review of Green Belt around Oxford should be undertaken with all Districts and stakeholders involved.

The plans for suburban expansion of Didcot should be replaced by a Garden City west of Steventon and East of East Hanney.

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Date:

17 Dec 2014

Part B (6 Consultation process)

Name or Organisation : Gordon Stokes

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Paragraph Policy Proposals Map

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The consultation process on the Housing Delivery Update has been of insufficient quality and depth. Despite this the report to the Council about the consultation process seriously understated the extent and degree of challenges and opposition to the proposals voiced both in the many written comments received and at the public meetings convened to discuss the Housing Delivery Update. As a result, I believe Council members may have approved the Plan without an adequate knowledge of the outcome of the consultation.

In April 2014 my comments on the quality of the consultation on the housing elements included:-

- "Publicity. The press release (20 Feb) must rank as one of the most lacklustre and boring I have read for such an important consultation, and the local press duly paid it little attention.
- Parish Councils claim not to have been informed about the proposals in advance. Much more publicity should have been given.
- There were public meetings, but not starting till 11th March and finishing on the 25th March, leaving only 10 days for people to lodge comments. None of these meetings was held in the Green Belt area which comprises around 15% of the Vale population, and is expected to take most of the housing outside the Milton/ Harwell area.
- Material such as display boards seems to have appeared on the website at a late stage.
- Choice or fait accompli? Matthew Barber has said "*There's no escaping the challenges we have to face and we are going to have to make some difficult decisions to meet the housing target we are set*". It appears VOWH had already made these decisions rather than openly seeking views. Any proper consultation should put forward a range of options and invite comment on them – not put the onus for alternative suggestions on the public. Without any cohesive alternative proposals to consider it invites the conclusion that "none of the alternatives put forward provided comprehensive and satisfactory proposals".
- The leaflet (which the Vale left to Parish Councils to deliver rather than so itself) says "One of the biggest concerns raised in last year's consultation was whether or not the infrastructure in the Vale can cope with this growth. As a result of these comments, the Vale is preparing a new and comprehensive Infrastructure and Community Benefits strategy. This strategy will reinforce the requirement that all developers building in the Vale must help deliver the local services and infrastructure needed to accommodate the growth." Surely this infrastructure review should be done before deciding where housing is appropriate?
- Modus operandi. Much of the above chimes very closely with Simon Jenkin's interview with the Daily Telegraph (Saturday 29 March 2014) in which he says that mafia style behaviour in the

planning system is traumatising the English countryside. "You have to go to Sicily to find some of the planning decision now being taken in Britain"... "We shouldn't have to fight for the Green Belt in 2014." Shrivvenham is cited in his list of areas where local people are 'traumatised'.

- This is at the same time that Nick Boles can write to Coalitions MPs saying that the government is "Re-affirming the importance of Green Belt protection and ensuring its robust safeguards are not undermined when assessing un-met housing need". And "We are also committed both to ensuring that the countryside and environmental protections continue to be safeguarded, and to devolving power down not just to local councils, but also down to neighbourhoods and local residents". We expect our voices to be listened to as part of participating in local democracy rather than, as I suspect, being treated as 'nimbyism'.

The *current round* of consultation has received more publicity but has provided a large amount of confusion due to:-

- Many people reporting that the comments web site is very difficult to use, or not accepting responses.
- The published word document being poorly formatted and requiring re-formatting of table rows to enable comments to be written. (For these reasons my comments are sent on an adapted version of the word document rather than using the online facility).
- Confusion amongst the public as to what can be commented on at this stage. Many responses you receive will be purely about the *content of the plan* that people felt they had no opportunity to comment upon earlier rather than on soundness, legality or duty to co-operate. This is due in large part to the inadequacy of the February-April 2014 consultation.
- Confusion due to 2 leaflets being sent in very short succession (on this consultation, and on the Vale Design Guide and CIL aspects). Again, many comments will be sent to the wrong 'destination'.
- Confusion over Green Belt boundary issues. Since the Green Belt Review is somewhat separate from the Local Plan, and it is Green Belt issues which are of most personal concern to many people, many responses are likely to relate to specific boundary changes that are not an immediate part of this consultation (except that the process of definition in relation to the Local Plan is unsound).

These aspects all point to the current plan being unsound in its preparation.

(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.

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?

NO **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:

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: