



**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](mailto: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	Mrs	
First Name	Claire	
Last Name	Tyrrell-Williams	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	Farm Cottage	
Line 2	4a High Street	
Line 3	Cumnor	
Line 4	Oxford	
Post Code	OX2 9PE	
Telephone Number		
E-mail Address (where relevant)		

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

*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.

The Local Plan is unsound, is not legally compliant and is not 'justified':

1) It is not 'based on solid facts and research'

The Oxfordshire Strategic Housing Market Assessment (SHMA) figures upon which the local plan is based are unsound and unsustainable. The figures are based on an unrealistic growth assessment, which is in contradiction to the Government's own official projections (being 2.5 times higher!). An independent critique of the SHMA by a leading expert concluded that the estimate was 'grossly overstated'. There is no evidence that the Council has challenged or even questioned these figures, despite concerns also being raised by organisations such as CPRE Oxfordshire and politicians alike.

Furthermore, the SHMA itself states that it should only be a starting point for determining future housing need and that further work should be done to test whether it can be 'accommodated sustainably' before being adopted as a housing target. This further work has not been conducted by the Council.

The Council's own documentation states that 'Our Local Plan should be the best approach when considered against the alternatives. These should all be realistic and have undergone a sustainability appraisal process looking at the pros and cons of each option'. There is no evidence that this has happened.

2) 'Proof of involving the local community and key stakeholders'

The Local Plan has not met the minimum standards required of the 'Statement of Community

Engagement' and as such is not legally sound. As a minimum requirement, the local land owners should have been informed. My family own one of the sites in question in Cumnor Village and so I know that this has not happened. The Council have not had the decency to contact us about this matter.

The views of key stakeholders, such as Oxfordshire County Council, CPRE Oxfordshire and local Councillors/ politicians have also not been taken into account.

The sites suggested for removal from the Green Belt in Cumnor did not appear in the Local Plan Part 1. There has therefore been no formal consultation regarding this aspect of the plan (and suggests an underhand way of trying to get something 'through the back door').

I work as an Associate Director for a Market Research firm specialising in Local Government Research and so I am therefore well aware that the consultation regarding this matter is wholly inadequate and in contravention of the Council's own Consultation Strategy and policies regarding consultation. A robust consultation procedure has not been undertaken. The methodology is insufficient and does not give the opportunity for 'hard to reach' groups and 'vulnerable audiences' to be heard. This form and the accompanying documentation is complicated for anyone to access and to complete. The consultation period has also been insufficient in length, especially given that it is conducted in an extremely busy period (in the lead up to Christmas).

(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.

- 1>

A review of the SHMA needs to be undertaken
- 2>

Robust and valid consultation with local residents needs to be conducted

**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**, I do not wish to participate at the oral examination

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**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:

As a specialist in local authority consultation and research, I would like to comment on the consultation of the Local Plan

**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:

14<sup>th</sup> December  
2014