



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="Layla"/>	<input type="text"/>
Last Name	<input type="text" value="Moran"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation representing (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>

Sharing your details: please see page 3

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

Overall
plan

Policy

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

I believe the Vale Local Plan Part 2 is currently **NOT SOUND** and **NOT COMPLIANT WITH THE DUTY TO COOPERATE**.

I support the more detailed submission by the Vale of White Horse District Council Liberal Democrat group.

1. Housing allocations in Local Plan Part 2 must be based on evidenced need using the latest and most accurate available formula – not the now outdated SHMA figures.

- a. The government's housing white paper 'Planning for the right homes in the right places' published in September 2017 sets out significantly reduced figures for both the Vale's assessed need and Oxford City's assessed need. Oxford's need is down from 1200-1600 per year to 746 and Vale is down from 1028 per year to 689. Therefore, Vale's share of any unmet Oxford need has either disappeared or dropped sharply and it is likely that the Vale has already identified more than enough sites in the Part 1 plan to cover their own need, five-year supply and any Oxford unmet need.
- b. If the purpose of Part 2 is to allocate housing sites to help meet Oxford's unmet need, using the new government formula, this need has already been met through Part 1. Therefore, **allocating additional sites in the Vale is unnecessary, and the plan is unsound.**
- c. Oxford City's Local Plan has not yet been submitted to the Planning Inspector. Therefore, we do not yet have confirmed figures for Oxford's unmet housing need. Producing the Vale Local Plan Part two – to allocate sites to contribute to Oxford's unmet need – without knowing what Oxford's unmet need will be and how many sites they will be allocating within the City boundary is premature. As a result, **Part 2 of the Vale plan is not based on**

accurate housing need figures so is unsound. The Vale Plan should be paused until the Oxford City plan has been adopted and we know what the unmet need is – if any.

- d. Along with others I submitted a response to Oxford City Council calling on them to shift the balance within their Local Plan proposals from employment generation to housing provision. This should be taken account of before further increases in housing in the Vale.

2. Land safeguarded in Sunningwell for two new bus and cycle roads must be removed from the plan (Core Policy 12, page 42 of the Plan and page 32 of Appendix B)

- a. The Map on page 32 of the appendices, safeguarding two new bus and cycle roads between Sunningwell Village and the land safeguarded for a Park and Ride at Lodge Hill, was produced by a Vale Planning Officer without input or support from the Highways authority and there is no sound justification for these two new roads and they should be removed from the plan.
- b. The route shown on this map does not follow the line of the landscape, cuts across farm land, goes across one resident's front garden, and the driveway for a property that has just been granted planning permission. This route, which goes right to the brow of a hill, would damage the landscape surrounding Abingdon – in contradiction with 'Purpose 4' of the Green Belt around Dalton Barracks in the Vale's own 'Green Belt Study – Land Surrounding Dalton Barracks, Feb 2017' which is to protect the landscape around historic towns.
- c. If a cycle route from Dalton Barracks to Lodge Hill was required, the preferred route would be via the North Abingdon housing development (Strategic site allocated in Local Plan Part 1 that has already been granted outline planning permission). The North Abingdon development includes good cycle routes north and will also provide a link to Radley Rail station. This cycle route would be flatter and overlooked by houses and shops so would be preferred by cyclists.
- d. Sending buses along these two additional routes could undermine the viability of local bus services on existing routes and would hamper the County Council's efforts to encourage commuters to use the very well served Oxford Road route into Oxford and the number 4 service through Wootton.
- e. Building these unnecessary additional bus and cycle lanes would be costly and divert funding away from other transport projects that are justified and have a sound evidence base. County Council officers have confirmed they have no intention to deliver these two roads so **there is no sound argument for the land being safeguarded in the Part 2 Plan.**

3. Local Transport Infrastructure for Dalton Barracks site is not Sufficient (Policy 2, paragraphs 2.81 and 2.82, page 40 of the Plan and page 15 of the appendices)

- a. The plan uses the Park and Ride at Lodge Hill (which is identified as a possible site for Park and Ride in the County Council's Local Transport Plan 4) as justification for additional housing at Dalton Barracks. However, the use of Lodge Hill Park and Ride to facilitate housing growth at Dalton barracks is contrary to advice from the County Council as Highways Authority and therefore makes the plan unsound and demonstrates a lack of cooperation with the key stakeholder in relation to transport planning.
- b. The Local Transport offer from Dalton Barracks needs to be strengthened. The enhancement of local bus routes (such as the 4) is essential to make the Dalton Barracks site sustainable and this should be made clearer in Local Plan Part 2.

4. There is no justification for removing Green Belt Status from the village of Shippon

- a. The village of Shippon should retain its washed over green belt status. Paragraph 2.74 says that Shippon will be part of a new continuous settlement at Dalton Barracks, but the village of Shippon contains within it spaces that could be developed if they did not continue to have green belt protection. Development within these spaces would have a detrimental impact on this historic village and the Part 2 plan does not put forward clear reasons why the village of Shippon should not remain in the green belt.

5. The Vale Local Plan Part 2 does not include much needed policies for Electric Vehicle Charging Points and is not ambitious enough on cycling

- a. National and local government initiatives to reduce the number of petrol and diesel vehicles and increase the use of electric vehicles are very welcome, but these initiatives will only be successful if Local Planning Authorities ensure that charging points and suitable electricity supplies are provided as part of development.
- b. Part 2 should include a policy ensuring all housing, industrial and retail developments in the Vale include facilities to support the take up of electric and/or low-emission vehicles, particularly where air quality issues in the area have been identified.
- c. The Vale should look at significantly improving local cycle routes and infrastructure to support them. The proposed development will be within reasonably cycling distance of Abingdon and Oxford IF cycle infrastructure is significantly improved.

6. The Vale Local Plan Part 2 does not include much needed policies to increase the number of affordable homes

- a. The Vale currently requires developers to provide 35% affordable homes on new build developments. Oxford City Council requires 50% and West Oxfordshire requires 40%. Given that the additional housing sites are specifically to meet Oxford's unmet need, we should require the sites allocated in the Vale Local Plan Part 2 to provide 50% affordable homes.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.

I request the following modifications to Local Plan Part 2:

1. a) The housing need targets for Oxfordshire's unmet need should be reviewed before this plan is adopted considering the Government's housing white paper 'Planning for the right homes in the right places'
b) The Vale plan should be paused until the Oxford City Local Plan is adopted and we are clear what their unmet housing need figure is.
2. The safeguarded land for bus and cycle routes in Sunningwell should be removed from the plan (Core Policy 12, appendix B, page 32)
3. References to Dalton Barracks being serviced by a Park and Ride at Lodge Hill should be removed from the plan ((Policy 2, paragraphs 2.81 and 2.82, page 40 of the Plan and page 15 of the appendices)
4. Green Belt status to be retained for the parts of Dalton Barracks that will be used as a country park and for the existing village of Shippon
5. An Electric Vehicle Charging Point policy for the Vale should be included
6. Cycle infrastructure should be significantly improved
7. a) The housing sites identified in Part 2 to help meet Oxford unmet need should provide 50% affordable homes (as per the Oxford City policy)
b) A new affordable housing policy should be included, to increase the proportion of affordable homes delivered across the Vale

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

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 Member of Parliament for Oxford West & Abingdon I would like the opportunity to represent the thousands of my constituents who will be directly and indirectly affected by these proposals.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

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