

Vale of White Horse Local Plan Part One: Strategic Sites and Policies

Publication Stage Representation Form

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(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

Personal Details*		2. Agent's Details (if applicable)
	se complete only the Title, Name and Organisation full contact details of the agent in 2.	
Title	Mr	
First Name	lan	
Last Name	Wilkinson	
Job Title (where relevant) Organisation		
(where relevant) Address Line 1	3 Barrow Hill Close	
Line 2	Abingdon	
Line 3		
Line 4		
Post Code	OX14 2LX	
Telephone Number		
E-mail Address (where relevant)		

Name or Organisation :					
3. To which part of the Local Plan does	s this represent	tation relate?			
Paragraph Policy			2, North Abingdon.		
4. Do you consider the Local Plan is:					
4.(1) Legally compliant	Yes		No		
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	No.	
4 (2) Complies with the Duty to se					
4 (3) Complies with the Duty to co- operate	Yes		No		
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 with the duty to co-operate					

The land between Oxford Road (Lodge Hill), Peachcroft Farm and Twelve Acre Drive should NOT be taken out of the greenbelt and built on.

The land was NOT identified by the district council's greenbelt review. The land was NOT included in the district council's draft Local Plan (February 2014) and its consultation.

I asked Mark Williams, Team Leader, Planning Policy, Vale Of The White Horse District Council how this land had been included in the Local Plan (telephone call, 11 November 2014).

He told me the land was selected because Planning Policy wanted to build as many houses as possible in North Abingdon (NOT a particular number of houses) and they believed the greenbelt review was "unduly restrictive".

They asked the district council if this land could be removed from the greenbelt after a "further review".

It was a "full council decision to have further work done".

The "North of Abingdon Landscape and Visual Impact Assessment" ("The new Local Plan 2031", "Evidence base", "Landscape and Environment") is the (supposed) further review that says the land can be removed from the greenbelt and built on.

I said to Mark Williams, "Using this method, doesn't that mean you can arbitrarily take any land you like out of the greenbelt?", and he said, "Yes".

This is NOT a proper procedure for removing land from the greenbelt.

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.

The land between Oxford Road (Lodge Hill), Peachcroft Farm and Twelve Acre Drive
should NOT be taken out of the greenbelt and built on.

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?

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S	gnature:			I	Date:	18 December 2014

Name or Organisation :					
3. To which part of the Local Plan doe	s this represent	ation relate?			
Paragraph Policy		Proposals Map	2, North Abingdon.		
4. Do you consider the Local Plan is:					
4.(1) Legally compliant	Yes		No		
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	No.	
4 (3) Complies with the Duty to co- operate	Yes		No		
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					

The district council's draft Local Plan (February 2014) included land opposite the entrance to Radley College, Radley (6, North Radley in the draft Local Plan).

comments.

The land between Oxford Road (Lodge Hill), Peachcroft Farm and Twelve Acre Drive was substituted in lieu of this land.

I suspect the land opposite the entrance to Radley College was removed from the final Local Plan because Radley College didn't want a housing estate opposite their entrance.

Mark Williams, Team Leader, Planning Policy, Vale Of The White Horse District Council, said this had happened because it was "a better arrangement" (public meeting, Guildhall, Abingdon, 19 November 2014, telephone call, 27 November 2014).

- "A better arrangement" is NOT an "exceptional circumstance" for removing land from the greenbelt and building on it.
- 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.

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Please note the Inspector will dete have indicated that they wish to pa			dopt to hear those	who
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Signature:	lan Wilkinson		Date:	18 December 2014

Name or Organisation :					
3. To which part of the Local Plan doe	s this represen	tation relate?			
Paragraph Policy	/		2, North Abingdon.		
4. Do you consider the Local Plan is					
4.(1) Legally compliant	Yes		No		
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	No.	
4 (3) Complies with the Duty to co- operate	Yes		No		
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.					

It's NOT sensible or safe to build a housing estate on the land between Oxford Road (Lodge Hill), the farm buildings, Peachcroft Farm and Twelve Acre Drive.

The land is outside of Abingdon and contained by two fast main roads.

Air pollution is already a problem at this location.

I asked Mark Williams, Team Leader, Planning Policy, Vale Of The White Horse District Council, (telephone call, 27 November 2014) how people will cross Twelve Acre Drive to get to Abingdon and he said, "an acceptable solution that can be delivered will be found".

I suspect people who would live within this housing estate will be required to enter and leave by car.

The land between Oxford Road should NOT be taken out of the			elve Acre Drive	
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Please note the Inspector will dete have indicated that they wish to pa			dopt to hear those	who
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Signature:	lan Wilkinson		Date:	18 December 2014

Name or Organisation :					
3. To which part of the Local Plan does	s this represent	ation relate?			
Paragraph Policy			4, North West Radley.		
4. Do you consider the Local Plan is:					
4.(1) Legally compliant	Yes		No		
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No -	No.	
4 (3) Complies with the Duty to co- operate	Yes		No		
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 land in Whites Land, Radley should NOT be removed from the greenbelt and built on.

As part of the development of the Vale Of The White Horse Local Plan 2011 there was a public inquiry in 2005.

With respect to a request by the land owner, Radley College, to build on the Abingdon side of the farmland between Abingdon and Radley the planning inspector said:

"the gap is already fairly narrow and largely open so that the loss of this site to built development might well contribute to an increased perception of coalescence from some viewpoints, due to the intervisibility between settlement edges".

pp. 29 - 30.

http://www.whitehorsedc.gov.uk/sites/default/files/Inspectors%20Report%20Chapters%201-7.pdf

http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan/local-plan-2011

The same argument applies on the Radley side of the farmland between Abingdon and Radley.

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

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Signature:	Ian Wilkinson	Date:	18 December 2014

Name or Organisation :					
3. To which part of the Local Plan does	s this represen	tation relate?			
Paragraph Policy	SHMA	Proposals Map			
4. Do you consider the Local Plan is:					
4.(1) Legally compliant	Yes		No		
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4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	No.	
4 (3) Complies with the Duty to co- operate	Yes		No		
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					

With respect to the Local Plan, Matthew Barber, Leader, Vale Of The White Horse District Council, said, "we don't want to do this" (public meeting, Guildhall, Abingdon, 19 November). He argued that the district council were required to do what the SHMA told them to do. However, the SHMA is only opinion.

Matthew Barber also said that Cherwell District Council had had their Local Plan rejected by the planning inspector because it didn't do what the SHMA said. However the planning inspector only told Cherwell District Council to *take account* of the SHMA and NOT to take their instructions from it.

The district council have made a mistake.

comments.

The Local Plan should be revise	ed or rewritten.			
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Signature:	Ian Wilkinson		Date:	18 December 2014

Name or Organisation :				
3. To which part of the Local Plan does	s this representat	tion relate?		
Paragraph Policy	Greenbelt, Abingdon and Radley.	Proposals Map	р	
4. Do you consider the Local Plan is:				
4.(1) Legally compliant	Yes		No	
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	No.
4 (3) Complies with the Duty to co- operate	Yes		No	
Please mark as appropriate.				
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Matthew Barber, Leader, Vale Of The White Horse District Council, wrote on his Twitter account on 15 October 2014:

"One step closer to protecting the Vale as @WhiteHorseDC Council agrees Local Plan with support from Labour and Independent Councillors."

However, the greenbelt in Abingdon and Radley isn't being protected by the Local Plan; the greenbelt in Abingdon and Radley is being abandoned by the district council.

The district council are arguing that the greenbelt isn't allowed to exist in Abingdon and Radley.

The greenbelt should NOT be r	emoved from Abir	ngdon and Radley.		
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Signature:	Ian Wilkinson		Date:	18 December 2014

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Paragraph Policy	Consultation	Proposals Map			
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4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No		
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This consultation form says it has to be returned to Planning Policy in Wallingford.

However, having spoken to Planning Policy, it can be returned to the district council's main office in Abingdon (and presumably elsewhere).

Therefore, this consultation form specifies a restriction to it being submitted that does NOT apply; that it has to be returned to an address in Wallingford.

Some people intend to return the form by hand and the instructions on the consultation form may be the only instructions that are read by people responding to the Local Plan consultation.

This may mean that people travel to Wallingford or decide NOT to submit their response to the Local Plan consultation.

This consultation form should therefore be amended so that this restriction isn't followed when it doesn't have to be.

Having complained about this to Sophie Horsley, Manager, Planning Policy, Vale Of The White Horse District Council, she said, "You make a good point that we could have made it clearer that there is the option to hand in representations at Abbey House in Abingdon and I will take that on board in organising consultations in the future." (Email, 17 December 2014).

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

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text. Please be as precise as possil This consultation form should be		he consultation exter	nded as a result	
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Signature:	lan Wilkinson		Date:	18 December 2014

Please note that any non-compliance with the duty to co-operate is incapable of modification at

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Paragraph Policy	Consultation	Proposals Map			
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The Local Plan Consultation has NOT been conducted in a proper and reasonable manner.

The district council said they were going to publish the Local Plan in August and consult on it then. NO explanation has been given by the district council as to why the publication of the Local Plan was delayed.

It appears it was delayed to allow the required consultation to take place in the weeks before Christmas.

I suspect holding the Local Plan consultation at this time of year was to restrict opposition to the opinion of the district council and its planning policy department.

The district council wouldn't hold an election in the weeks before Christmas so why is it reasonable to hold a Local Plan consultation?

The Local Plan consultation should	d be re-run.				
Please note your representa		•			
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Please note the Inspector will det	ermine the most app	ropriate proce	edure to ad	opt to hear those	who
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