



**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

Steven

Last Name

Sensecall

Job Title

(where relevant)

Partner, Planning

Organisation

(where relevant)

Kemp & Kemp

Address Line 1

1-3 Ock Street

Line 2

Abingdon

Line 3

Oxfordshire

Line 4

Post Code

OX14 5AL

Telephone Number

E-mail Address

(where relevant)

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

Core Policy
11

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

x

No

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

No

x

4 (3) Complies with the Duty to co-
operate

Yes

N/A

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.

We are instructed by the Midcounties Cooperative ("The Co-op") to submit representations in respect of the recently published Local Plan 2031 Part One, Strategic Sites and Policies (November, 2014). Similar representations were made in

May, 2013 in response to the Vale of White Horse Consultation Draft Local Plan 2029. Those comments still stand.

The Co-op **objects** to the subtle but important alteration to the wording of paragraph (ii) of Core Policy 11: omitting “proportionate” from the previous iterations of Core Policy 8. In the Co-op’s view, this change in policy wording is neither ‘**justified**’ or ‘**effective**’ given it has already been demonstrated that a scheme which is not “proportionate use” to the Botley local centre is inappropriate development.

The Council’s own evidence base – the Nathaniel Lichfield & Partners Retail and Town Centre Study (March 2013) – which intends to inform and provide a credible evidence base for the Local Plan, does not support a scheme of the scale envisaged by Core Policy 11. For evidence of this there is no need to look any further than the recent refusal of Doric’s proposals for a large scale redevelopment of the Botley Central Area, which was deemed to be of disproportionate scale and more appropriate to a Town Centre than to a local centre such as Botley. The Local Plan proposes no change to Botley’s status; therefore the Co-op considers that the over-ambitious detailing of Core Policy 11 is not justified when considered alongside Core Policy 3: Settlement Hierarchy. On the basis of the NLP Study, there is no need or justification for development of the scale Core Policy 11 would enable. Indeed, it is clear that the comprehensive retail-led redevelopment would undermine the viability of the existing retail units in Botley.

The Co-op’s view is that the proposals for Botley in Core Policy 11 are over-ambitious and unlikely to be viable. Given the land ownership position within the area outlined as part of the Botley Central Area, the Co-op also question the ability of the Local Plan to deliver a “comprehensive retail-led redevelopment and upgrading of Botley Central Area” as envisaged in Core Policy 11.

It is therefore the Co-op’s view that Core Policy is unsound, on the basis that:

- It has not been positively prepared in that it does not meet objectively assessed development requirements;
- It is not **justified** in that there is a reasonable and viable alternative (as the Co-op has previously proposed);
- It is not **effective** in that it has already been demonstrated by the recent refusal of Doric’s proposals that the scheme of the scale envisaged by Core Policy 11 is unlikely to be delivered over the period of the Local Plan.

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 Co-op recognises that the Botley Central Area needs improving but is firmly of the opinion that there is another way forward than that detailed in Core Policy 11. A more modest set of proposals for the Botley Central Area would result in proposals which are more realistic and more likely to succeed. Having regard to these matters, the Co-op firmly believe that Core Policy 11 should be amended as follows:

Core Policy 11: Botley Central Area

Proposals for a ~~comprehensive~~ retail-led redevelopment and upgrading of Botley central area *including the redevelopment of Elms Court and the adjacent offices and the refurbishment of the West Way Shopping Centre*, as defined on the adopted Policies Map, will be supported provided that:

i. taken as a whole, the proposals support and are appropriately scaled to 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.

~~ii. effective and proportionate use is made of development potential above ground level and on more peripheral parts of the site for a mix of uses including, but not limited to, office, community, residential, hotel and leisure activities.~~

~~ii~~ ~~iii~~. existing community facilities, including the community hall, library and Baptist church are replaced with facilities of an appropriate size and quality to meet current and likely future local needs.

~~iii~~ ~~iv~~. it can be demonstrated that proposals will not harm the character or appearance of the Botley central area, and will not cause unacceptable harm to the amenities of nearby residents, for example by noise pollution from late night opening.

iv. proposals for the site are prepared through a ~~comprehensive~~ master planning process providing an integrated solution to site access, servicing and sufficient car parking whilst prioritising the pedestrian customer environment.

vi. 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.

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:

The Midcounties Co-operative wishes to attend the Examination to confirm its objection to the Council's strategy for the Botley Central Area and to provide written and oral evidence as to the appropriate alternative options available.

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:

19/12/2014