



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 | Keith | |
| Last Name | Mintern | |
| Job Title (where relevant) | | |
| Organisation (where relevant) | | |
| Address Line 1 | 71 Crafts End | |
| Line 2 | Chilton | |
| Line 3 | Didcot | |
| Line 4 | Oxon | |
| Post Code | OX11 0SB | |
| 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 | <div>4.24</div> | Policy | <div>Core Policy 4: Meeting out housing needs</div> | Proposals Map | <div></div> |
|-----------|-----------------|--------|---|---------------|-------------|

4. Do you consider the Local Plan is :

| | | | | |
|--|-----|--------------|----|--------------|
| 4.(1) Legally compliant | Yes | <div>X</div> | No | <div></div> |
| 4.(2) Sound (Positively Prepared, Effective and Justified) | Yes | <div></div> | No | <div>X</div> |
| 4 (3) Complies with the Duty to co-operate | Yes | <div>X</div> | No | <div></div> |

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.

Paragraph 4.24 states that “It is anticipated that this will deliver approximately 23,000 jobs between 2011 and 2031”.

The VWHDC appears to have accepted these job figures without any scrutiny.

A recent planning application for 200 homes in Leicestershire in which the planning Inspector Jonathan G King said he could “place little or no reliance” on the local SHMA (produced by GL Hearn) and was unable to give it “Significant weight in the determination of the application”. (SOURCE: <http://majorapps.planningportal.gov.uk/wp-content/uploads/documents/2425527/S62A-2014-0001%20-%20Statement%20of%20Reasons.pdf>). The Inspector also noted that SHMAs should not take into account the “aspirational employment growth of the Local Enterprise Partnership (LEP)” (Paragraph 26).

Further to this, the Oxfordshire Innovation Engine, Realising the Growth Potential, October 2013 (http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf), paragraph 6.10 states that “...road congestion is a major issue for firms: 23% of those responding to our survey identified it as a constraint on growth, and most of those interviewed expressed concerns, particularly in relation to the A34...”

It would therefore seem irresponsible and premature to allocate unprecedented large strategic housing sites on greenfield sites within the legally protected landscape of the North Wessex Downs AONB, particularly if the predicted growth is not realised.

As such, the plan is unsound.

(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.

In order to make the Local Plan sound and legally compliant, and protect the North Wessex Downs AONB, the following modifications are necessary:

- Remove the entire allocation of 850 homes from the Harwell East Campus.
- Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of houses from 550 to 400 including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus(including the 125 already given outline permission), provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
- Reallocate the 850 homes from the Harwell East Campus and the additional 150 houses from the North West Harwell Campus (1,000 houses in total) to other sites already identified by the Vale of White Horse, for example:
 - (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
 - (b) Didcot A (capacity for 425 houses), or
 - (c) Land West of Steventon (capacity for 350 houses), or
 - (d) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district.
- Or reduce the total SHMA allocation for the District by 1000
- Remove the North Wessex Downs AONB entirely from the Science Vale “Ringfence” in order to protect it from future speculative development should the Science Vale fall behind in delivery of its housing targets.

Only by implementing these steps in full will the Local Plan be compliant with the NPPF paragraphs 115, 116 and the CROW Act 2000.

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?

X

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:

11/12/14