

# 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

Mr

First Name

Peter

Last Name

Gore

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

Spinneys Cottage

Line 2

51 Lower Radley

Line 3

Abingdon

Line 4

Post Code

OX14 3AY

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 2

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

X

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

Yes

No

X

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

Yes

No

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.

This policy states that cooperation with other Oxfordshire Authorities will include a full strategic review of the whole of the Oxford green belt.

This is entirely inconsistent with the Vale having carried out their own review, and would seem to raise the possibility of a succession of reviews until the desired answer is achieved each time a new housing needs assessment is produced.

This principle is contrary to National Planning Policy Framework (NPPF) which makes it clear that a green belt boundary should only be altered in “exceptional circumstances”.

Similarly this principle is contrary to Government guidance (6th March 2014) which states that “Unmet housing need is unlikely to outweigh the harm to the green belt and other harm to constitute the “very exceptional circumstances” justifying inappropriate development on a site within the green belt”

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 overarching principle of the Green Belt should be upheld and no significant development permitted or considered in these designated areas.

Greater emphasis needs to be placed on co-operation with neighbouring authorities, **other than Oxford City**, in support of their approach to addressing housing requirements locally. Oxford does NOT have a priority position.

**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: ☐

**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:

13-12-2014

## 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 4** Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>

*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.

This policy sets out the housing target based on the Oxfordshire strategic housing market assessment (SHMA) which is unsound as the basis for the Local Plan:

1. The SHMA is based on wildly optimistic employment forecasts which have not been challenged or scrutinised by the Vale Council.
2. The SHMA itself states that it should only be a starting point for the determination of housing need and that environmental, social and infrastructure constraints should be taken into account.

Neither requirement has been fulfilled by the Vale Council and the Core Policy cannot be considered legal, sound or fulfilling any other duty

Furthermore previous consultations have been ignored by the Vale Council i.e. about 500 Radley residents responded in April using our standard letter. These were all considered as one objection, despite assurances from Council Leader Matthew Barber on 4th April that they would be considered individually.

Similarly the Vale now admit that there were problems with their website. It is unknown if any comments were lost as a result but an extension was granted to key landowner Radley College, whose response is dated 11/04/2014 a full week after the close. No such extension was offered to the public.

This cannot be considered 'sound' and the legality of these democratic responses being ignored by public servants must be questioned

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.

Rigorous challenge of the assumptions and conclusions of the SHMA must be completed as has happened in neighbouring authorities who concluded the assumptions/conclusions were unjustified, unsustainable and unsupportable.

Previous consultation responses must be considered in full and given due democratic weight

***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.

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***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:

13-12-2014

## 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 13** Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

*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 extension of the “North Abingdon” site east of Oxford Rd into Peachcroft Farm was not included in the document for consultation in April. The Vale green belt review of February 2014 did not recommend that this area was withdrawn from the green belt and is wholly unjustified and unsustainable

The principle of significant development in the Green Belt is contrary to National Planning Policy Framework (NPPF) which makes it clear that a green belt boundary should only be altered in “exceptional circumstances”.

Similarly this principle is contrary to Government guidance (6th March 2014) which states that “Unmet housing need is unlikely to outweigh the harm to the green belt and other harm to constitute the “very exceptional circumstances” justifying inappropriate development on a site within the green belt”

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.

Ensure the unwarranted and unjustified insidious extension into Peachcroft Farm is deleted from further consideration.

The overarching principle of the Green Belt should be upheld and no significant development permitted or considered in these designated areas.

Greater emphasis needs to be placed on co-operation with neighbouring authorities, **other than Oxford City**, in support of their approach to addressing housing requirements locally. Oxford does NOT have a priority position.

***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.

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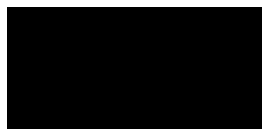
☐

**Yes**, I wish to participate at the oral examination

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***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:

13-12-2014