

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

Dr

First Name

Mary

Last Name

Gill

Job Title

Secretary

(where relevant)

Organisation

West Way Community Concern

(where relevant)

Address Line 1

19 Raleigh Park Road

Line 2

Oxford

Line 3

Line 4

Post Code

OX2 9AZ

Telephone Number

E-mail Address

(where relevant)

West Way Community Concern is a community-based volunteer organization of local residents and business people in Botley, North Hinksey and Cumnor parish. We formed in March 2013 when a developer revealed plans to the community for development at West Way. This much larger, scale development was very different from the proposal consulted on by the Vale in 2012.

- We support the improvement of West Way in line with community concerns: to retain Elms Parade, to protect Field House, and to invest in community facilities including the library.
- We strongly oppose redevelopment that would lead to the loss of existing local businesses.
- We seek to ensure that local views are meaningfully represented in the consultation, planning and development process.
- We engage with local politicians, experts, academics, businesses, shoppers and residents for support and to help us represent concerns to the Vale of the White Horse District Council and the developers.
- Our objective is to ensure that the West Way area is improved to serve the growing population in the immediate geographic area, to support local businesses, and to provide an appropriate and sustainable development for future generations.

We have a mailing list of 750, and a core group of volunteers amounting to 100 people.

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

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:

WWCC's remit is to represent the large proportion of the local population who were opposed to the proposed redevelopment at West Way, Botley. The objections to the proposals were on the physical scale of the development, the demolition of up to 100 homes and demolition of a non-designated heritage asset, the loss of around 30 local independent businesses and the impacts of increased traffic.

There was also considerable concern about the manner in which this planning application came about. The Vale owns part of the land to be developed, and hence has an interest in any financial gain from development; the planning application and the drafting of the draft local plan were running concurrently, with correspondence and meetings between the developer and the Vale Planning Policy team; and the Leader of the Council and Chief Executive both spoke out in support of the development. There was considerable doubt as to whether the Vale could be impartial in determining the planning application.

In the event, the planning application was rejected unanimously by the Planning Committee, against the recommendation of the Planning Officer.

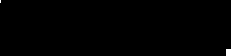
As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

It is important that the ambiguities of Botley's status are removed from the local plan. We wish to be able to give any points of clarification on any aspects specific to Botley, given its slightly anomalous position part of the Vale of White Horse District Council, while also a suburb of Oxford City.

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:

17 Dec. 14

Part B – 1: The status of Botley as a centre

Name or Organisation :West Way Community Concern

3. To which part of the Local Plan does this representation relate?

Paragraph

5.28 to
5.31

Policy

CP11

Proposals Map

Botley Central Area

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.

We consider that the Local Plan is unsound in its presentation of its policy for 'Central Botley'. It is ambiguous in its terminology, the definition of 'Botley Central Area' and its intentions for the area.

This section of the Local Plan is not responding to objectively assessed need, is not backed up by solid facts and research, and has not been subjected to full involvement of the local community. Indeed it contradicts the findings of a public consultation conducted in early 2012.

In Chapter 4, there is some ambiguity as to what a 'service centre' is and what a 'local service centre' is, which has repercussions throughout the local plan. This lack of clarity becomes almost contradictory in chapter 5 where the Oxford Fringe sub area is considered as a highly sustainable location for growth and the overarching priority is to maintain Botley as a service and employment centre.

Para 5.29 refers to the Nathaniel Lichfield Retail and Town Centre study and it appears that the policy for Botley is based on findings in this study. However the findings of this study with respect to Botley are misrepresented in the Local Plan text. The comparison with Faringdon illustrates this. Faringdon is a historic market town bearing no resemblance to Botley, functionally or physically. Faringdon has a large rural hinterland for which it is a major service centre, while Botley plays no such role.

The boundary of the central area has changed from the 2011 local plan and now includes the age-restricted housing of Field House and Vale House, only completed about 25 years ago and the Vicarage. Selective redevelopment within the original boundary would, therefore, be more appropriate. A public survey conducted by us in April 2013 showed strong opposition to demolition.

The evidence shows support for some redevelopment of the centre of Botley, but this should reflect local needs and be of a scale proportionate to the character of the area. This is not the right location for a major comprehensive redevelopment of the heart of the community to create a drive-to retail destination or district centre

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.

We suggest that the following wording would better present the existing and future needs of Botley and its function as a local service centre.

5.28. The West Way shopping centre is a 1960s, part-covered shopping centre that, **along with Elms Parade, which contains a number of small independent shops,** forms the main shopping area in Botley. ~~The West Way centre is located to the rear of Elms Parade, which contains a number of small independent shops.~~ This shopping area has served Botley well over the years but the West Way centre is now in need of refurbishment to fulfil its potential as a local service centre.

5.29. The most recent Retail and Town Centre Study⁴⁸ identifies that Botley is a similar size in terms of retail units and floorspace to the market town of Faringdon. ~~Despite this, it does not perform as a town centre~~ Its role is not as a town centre and does not provide the range of services and other facilities that would be expected **of a town centre since it functions as a local suburban centre in the context of Oxford.** There is a high level of local retail and leisure demand being met by services and facilities at the city of Oxford and **in Abingdon** ~~so outside the District. Botley also functions as a district centre in the Oxford City context.~~

5.30. The Retail and Town Centre Study identifies that around 25% of residents in the Botley retail catchment area do their main convenience shopping in the immediate area, with the majority travelling ~~into the city to~~ **supermarkets on the edge** of Oxford **and Abingdon**. The provision of a ~~food superstore~~ **larger supermarket** in Botley would address this imbalance. The study also notes that the provision of leisure and entertainment facilities, other than restaurants and pubs, is limited in Botley. Redevelopment of the area could therefore include **small scale** commercial leisure facilities, thereby helping to improve the overall offer and appeal of Botley as a shopping and leisure destination **for local people.**

5.31. **Partial** redevelopment of the central area could provide a larger supermarket, shops, offices, ~~hotel, car parking~~ and other uses to meet the needs of Botley and the surrounding area. **Core Policy 11** therefore supports proposals for ~~the~~ **some** redevelopment of **within** the Botley central area (**Figure 5.3**), which includes the West Way Shopping Centre and Elms Parade.

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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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

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:

We would like to point out the lack of clarity, many ambiguities and contradictions in the status of Botley as a centre, and which policies are meant to apply

WWCC's remit is to represent the large proportion of the local population who were opposed to the proposed redevelopment at West Way, Botley.

As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

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Signature:

Date:

17 Dec. 14

Part B – 2: Text was supporting a specific development – not responding to need

Name or Organisation : West Way Community Concern

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text" value="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 consider that the text is intentionally written to support a particular proposal for development at Botley.

Paragraph 5.30 refers to the fact that many of the residents of Botley do their shopping in the city of Oxford. Botley is 1.5 miles from the centre of Oxford, and served by a good bus service. For food shopping, Botley has two major supermarkets within 6 miles, both of which are within the boundary of the Oxford City Council.

The intention of this paragraph, as shown by statements in the Retail and Town Centre Study, is to allow development which will 'claw back' retail spend from the neighbouring council.

The Vale has expressed an intention to sell land that it owns in central Botley for a large supermarket, and at the time of writing the draft plan had already entered into an agreement with a developer, who was in discussion with Planning Policy concerning this proposed development. This paragraph and Figure 5.3 can be seen as intending to support this development, rather than addressing a defined need

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.

We suggest that the following wording would better present the existing and future needs of Botley and its function as a local service centre.

5.28. The West Way shopping centre is a 1960s, part-covered shopping centre that, **along with Elms Parade, which contains a number of small independent shops,** forms the main shopping area in Botley. ~~The West Way centre is located to the rear of Elms Parade, which contains a number of small independent shops.~~ This shopping area has served Botley well over the years but the West Way centre is now in need of refurbishment to fulfil its potential as a local service centre.

5.29. The most recent Retail and Town Centre Study⁴⁸ identifies that Botley is a similar size in terms of retail units and floorspace to the market town of Faringdon. ~~Despite this, it does not perform as a town centre~~ Its role is not as a town centre and does not provide the range of services and other facilities that would be expected **of a town centre since it functions as a local suburban centre in the context of Oxford.** There is a high level of local retail and leisure demand being met by services and facilities at the city of Oxford and **in Abingdon** ~~so outside the District. Botley also functions as a district centre in the Oxford City context.~~

5.30. The Retail and Town Centre Study identifies that around 25% of residents in the Botley retail catchment area do their main convenience shopping in the immediate area, with the majority travelling into the city to **supermarkets on the edge** of Oxford **and Abingdon**. The provision of a ~~food superstore~~ **larger supermarket** in Botley would address this imbalance. The study also notes that the provision of leisure and entertainment facilities, other than restaurants and pubs, is limited in Botley. Redevelopment of the area could therefore include **small scale** commercial leisure facilities, thereby helping to improve the overall offer and appeal of Botley as a shopping and leisure destination **for local people**.

5.31. **Partial** redevelopment of the central area could provide a larger supermarket, shops, offices, ~~hotel, car parking~~ and other uses to meet the needs of Botley and the surrounding area. **Core Policy 11** therefore supports proposals for ~~the~~ **some** redevelopment of **within** the Botley central area (**Figure 5.3**), which includes the West Way Shopping Centre and Elms Parade.

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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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

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:

Our contacts with the local community and other actors mean that we are in a good position to understand the processes that have occurred during the redevelopment proposals.

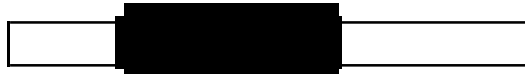
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As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

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Signature:



Date:

17 Dec. 14

Part B – 3: Boundary of Botley Central Area

Name or Organisation :West Way Community Concern

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

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

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 consider that the Local Plan is unsound in that it presents an area defined as 'Botley Central Area' which is not logical or justified.

The definition of the area, as shown in Figure 5.3, p58, is not the area that would be described as "Botley central area". Rather it relates exactly to an area relating to a Planning Application rather than what could be described as the functional area of the centre.

It includes

- sheltered housing separated from the shopping centre by a church and car park,
- a Baptist church at the South Eastern end of the area,
- a vicarage for St Peter and St Paul CoE church, and
- a path from Arthray Road to the shopping area.

But it excludes

- a bank and St Peter and St Paul church which become surrounded by the area marked,
- two shops and a public house on the North Western side of West Way (the main road through the area).

So it has added one church to the central area it has excluded another, but excludes banking and other retail and eating/ drinking land uses that are adjacent to the site. It also includes sheltered housing and a vicarage (for a church that has been excluded) while not including any other housing (except for flats above shops and offices). (See Figure 1 below)

Figure 5.3: Botley central area (annotated in colours other than red)

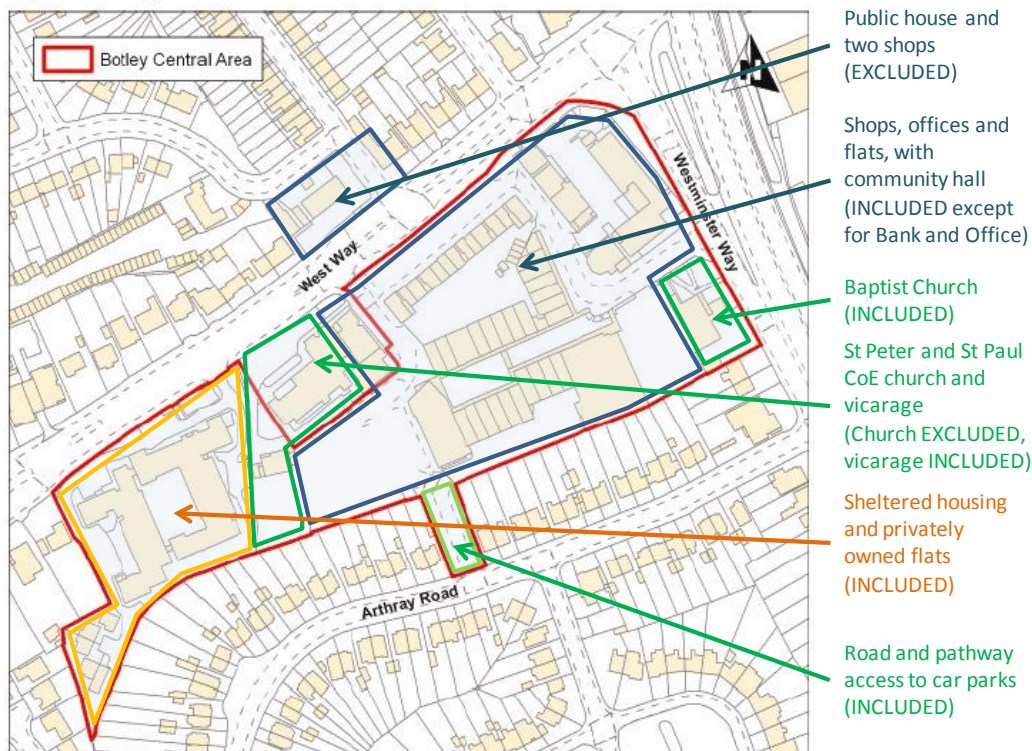


Figure 1 – Annotated version of Local Plan 2031 map for Botley (Figure 5.3)

That the red line is an illogical boundary is obvious from the elements included or not, but that it accords exactly with a planning application to redevelop the area bounded by the red line suggests that the boundary has been drawn to fit the development rather than vice versa.

Evidence of this is found in a letter relating to reasons why the applicant felt it was unnecessary to complete an EIA for the application, after a Screening Application was submitted *after* submission of the Application. The letter, dated 28 August 2012 from Julian Philcox Planning to the Major Planning Applications Officer at Vale of White Horse District Council included the following text:-

- “As an aide memoire I also attach a site location plan with the extent of the redevelopment site shown edged in red”, and
- Relating to a proposed Development Brief being drafted by the applicant. “Its scope would cover existing and emerging policy context, the likely mix of proposed uses, extent of site, key urban design, transport and development control issues, financial contributions and reference to delivery of the development including mention of the Council’s CPO powers.”
- “As mentioned at the time this would also serve us well in hopefully informing the emerging Core Strategy and to follow the Managing Development Document. The draft brief is being produced at present and will be forwarded to you for your comments shortly, David. I have discussed the prospect of the brief with Mark Williams, Team Leader Planning Policy. He was supportive of the approach.”

According to the ‘file properties’, the “Site location plan drawing” pdf document accompanying the letter relating to the EIA was produced by Mountford Piggott architects and was created on 15 August 2012.

We suggest that this aspect of the plan has been unduly influenced by developers rather than by due process and consideration of the best interests of the community.

The Mid Counties Cooperative pointed out the anomalous boundary in their objection to the Local Plan dated May 2013, and West Way Community Concern and others raised it again during the April 2014 consultation.

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.

- (1) Remove Figure 5.3 and replace it by a Figure which has the boundary of the 'Central Botley Area' covering only those areas which are clearly functionally part of Botley central area in terms and are suitable for redevelopment or refurbishment. (The Figure included in Appendix 5b the Vale's consultation document – 'Core Strategy – Preferred Options – January 2009).
- (2) Reword para 5.31: 'Redevelopment of the central area Core Policy 11 therefore supports proposals for the redevelopment and refurbishment of Botley central area (new Figure 5.3) which includes the West Way Shopping Centre ~~and Elms Parade~~'.

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

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:

Our contacts with the local community and other actors mean that we are in a good position to understand the processes that have occurred during the redevelopment proposals.

WWCC's remit is to represent the large proportion of the local population who were opposed to the proposed redevelopment at West Way, Botley.

As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

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Signature:

Date:

17 Dec. 14

Part B – 4: Core Policy 11

Name or Organisation : West Way Community Concern

3. To which part of the Local Plan does this representation relate?

Paragraph

5.28 to
5.31

Policy

CP 11

Proposals Map

Botley Central Area

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.

Core Policy 11 appears to have been written directly to support 'comprehensive redevelopment' of Botley Central Area, and sets out the conditions whereby such a redevelopment would be supported.

However, there is no validated, objective evidence that supports such a redevelopment.

Para 5.28 acknowledges the fact that the 1960s shopping precinct is in need of refurbishment. Para 5.31 then refers to 'redevelopment' of the West Way Shopping Centre and Elms Parade. Elms Parade itself is not in need of 'refurbishment' in the same way in which the West Way Shopping Centre does. It is privately owned and maintained and has full occupancy. It also includes rented housing. It is considered to be a non-designated heritage asset, and should be protected from redevelopment.

Core Policy 11 then refers to 'comprehensive redevelopment' of a much larger area (as described by Figure 5.3). This 'comprehensive redevelopment' supported by Core Policy 11 would remove rental housing which currently exists in Field House, and above the retail units in both Elms Parade and West Way Shopping Centre. Such a redevelopment would conflict with other policies and the NPPF.

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.

Core Policy 11

We therefore strongly object to the wording of Core Policy 11 and suggest the following amendments to the text:

Proposals for ~~a comprehensive retail-led~~ redevelopment and upgrading of Botley central area, ~~as defined on the Adopted Policies Map~~, will be supported provided that:

- i. taken as a whole, the proposals support 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 use is made of development potential above ground level and on more peripheral parts of the site for a mix of uses that may include, but are not limited to, office, community, residential, hotel and leisure activities~~
- iii. existing community facilities, including the community hall, library and Baptist Church are **retained** or replaced with facilities of an appropriate size and quality to meet current and likely future local needs
- iv. it can be demonstrated that proposals will ~~not harm~~ be **in keeping with and enhance** the character or appearance of the local area, particularly West Way, Arthray Way and Westminster Way
- v. proposals for the site are prepared through a comprehensive masterplanning process, **working with the community to provide** ~~providing an integrated solution to site access, traffic management, air quality management, servicing and sufficient car parking whilst prioritising the pedestrian customer environment, and~~
- 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.~~ should take account of the status of Elms Parade as a non-designated heritage asset.

It needs to be very clear that the area for redevelopment is the smaller site fronting Westminster Way, and does not include land currently occupied by residential properties.

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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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

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:

Our contacts with the local community and other actors mean that we are in a good position to understand the processes that have occurred during the redevelopment proposals.

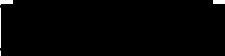
WWCC's remit is to represent the large proportion of the local population who were opposed to the proposed redevelopment at West Way, Botley.

As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

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Signature:



Date:

17 Dec. 14

Part B – 5: Visitor economy aspects not specific

Name or Organisation : West Way Community Concern

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

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

Please mark as appropriate.

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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.

Core Policy 31 introduces ambiguity, suggesting larger scale developments to support the visitor economy will be supported in market towns and local service centres. Shouldn't there be some evidence of need? Or are all speculative developments to be supported? And unconditionally?

Core Policy 31 is badly worded in that it uses 'larger' and 'smaller' without any reference as to what is the baseline of 'larger' or 'smaller'. All development should be 'proportionately scaled' to the local area.

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.

Reword Core Policy 31:

'The Council encourages new development to advance the visitor economy ..

- i. Within the built-up areas of the Market Towns ~~and Local Service Centres~~ – ~~larger scale~~ proportionately scaled developments including
- ii. Within the built-up areas of the Larger and Smaller Villages ~~and Local Service Centres~~ – ~~smaller and~~ proportionately scaled developments that are in keeping ...'

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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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

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:

WWCC's remit is to represent the large proportion of the local population who were opposed to the proposed redevelopment at West Way, Botley.

As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

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Signature:

Date:

17 Dec. 14

Part B – 6: Confusion of role of Botley Local Centre with nearby retail warehouse development

Name or Organisation : West Way Community Concern

3. To which part of the Local Plan does this representation relate?

Paragraph	6.50 to 6.53	Policy	CP 32	Proposals Map	Botley Central Area
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4. Do you consider the Local Plan is :

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

Para 6.50 and Core Policy 32 is confused in its definition of the area which is suitable for retail development within Botley. Para 6.50 notes that Seacourt Retail Park includes retail warehouse provision, but states that retail warehouse development should follow CP 32 which refers to first consideration being given to Botley Central Area, which is the Local Service Centre for the area and not suitable for warehouse development.

Para 6.52 introduces a contradiction again in applying town centre policies to local service centres. This is more than likely to cause exactly the confusion which was experienced on the recent West Way application. Policies should be much clearer than this.

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.

Delete 'Core Policy 11: Botley Central Area,' from para 6.52.

Provide unambiguous definitions of the purpose of Botley Central Area and other retail and employment areas within the Botley Area.

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

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:

WWCC's remit is to represent the large proportion of the local population who were opposed to the proposed redevelopment at West Way, Botley.

As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

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Signature:

Date:

17 Dec. 14

Part B – 7: Core Policy 37, high quality design

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

CP37

Proposals Map

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.

CP 37 needs strengthening. An expectation of high quality design is toothless as a policy.

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.

Text should include 'must be of high quality design' and the onus should be on the applicant to demonstrate how and why this is the case. It could usefully include something on engaging communities on major applications which will have an impact on their local area

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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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

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:

WWCC's remit is to represent the large proportion of the local population who were opposed to the proposed redevelopment at West Way, Botley.

As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

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Signature:

Date:

17 Dec. 14

Part B – 8: Core Policy 38, engaging the community

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

CP38

Proposals Map

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.

CP 38 could give higher profile to engaging communities in the design process

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.

Under Masterplan there should be an extra 2nd bullet point stating
“consult widely with the community on both the concept and the design and its implication for local people”

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

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:

WWCC's remit is to represent the large proportion of the local population who were opposed to the proposed redevelopment at West Way, Botley.

As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

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Signature:

Date:

17 Dec. 14

Part B – 9: Core Policy 39, Historic environmental policy

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

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

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 historic environment policy appears feeble and could be strengthened to give it more weight.

Development should always enhance the area

It's no good just maintaining a list of non-designated heritage assets. There should be a policy in the local plan giving some protection to them, or else what's the point?

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 following text changes should be made to CP39

(i) omit '*and where possible*'. New

(v) add (at end) **“, engaging the local community in this process.”**

(vi) Add **“and protecting”** after “*assessing*”

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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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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No, I do not wish to participate at the oral examination

☐

Yes

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:

WWCC's remit is to represent the large proportion of the local population who were opposed to the proposed redevelopment at West Way, Botley.

As currently drafted, the Local Plan would support such a development in the future – one which reduces the number of general market houses, which destroys the local economy and causes environmental damage.

We believe it is important that wording of the local plan properly describes what is needed for Botley, not determined by developer aspirations (or District Council's wish to maximise the value of its property assets). Confidence in the process will only be restored if the public feel they have been properly consulted and involved.

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Signature:

Date:

17 Dec. 14

Part B – 10: Core policy 44, protecting the green setting of Oxford

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

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

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.

CP 44 should make reference to protecting the green setting of Oxford and the importance of protecting views into and out of the city.

Applications for development which do not protect the green setting of Oxford or views into and views into and out of the city should be refused

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.

Opening text changed to:

The key features that contribute to the nature and quality of the Vale of White Horse District's landscape **and the green setting of Oxford** will be protected from harmful development and where possible enhanced, in particular:

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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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

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:

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Signature:

Date:

17 Dec. 14