



**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

Cllr

First Name

Richard

Last Name

Webber

Job Title

Group leader

(where relevant)

Organisation

Liberal Democrat Group

(where relevant)

Address Line 1

Orchard Barn

Line 2

Sutton Wick Lane

Line 3

Drayton

Drayton

Line 4

Abingdon

Post Code

OX14 4HJ

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation : VOWHDC Liberal Democrat Group

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" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	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 SHMA does not set housing targets." This is a direct quote from the GL Hearn SHMA report (page 183, para 9.63). Yet the Council has chosen to adopt the SHMA number, unmodified, as the Vale of White Horse District Council's housing target.

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.

- ☐ Take account of the SHMA economic forecasts, but also take account of how much development can be sustainably accommodated, and the social and environmental impacts of increasing the number of dwellings in the District by over 40% by 2031 (from the current 50,000 to over 70,000). Reduce the housing requirement from 20,560 to 19,050 and remove the four sites totalling 1,510 dwellings in the Oxford Green Belt (N Abingdon 800, NW Abingdon 200, NW Radley 240 & S Kennington 270)



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:

This is the only opportunity we have to challenge the SHMA and the employment figures and it is very important to the Liberal Democrat Group that they are offered that opportunity.

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:

17/12/14

Part B – Please use a separate sheet for each representation

Name or Organisation : VOWHDC Liberal Democrat Group

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

Please mark as appropriate.

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There is insufficient appropriate infrastructure to support the plan. Roads, schools, utilities, community facilities, local GP Surgeries and hospitals cannot possibly be sufficiently improved within the time-scale to 2031 to meet such an increase in demand. ☐

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☐ Remove the four allocated sites totalling 1,510 dwellings identified in the Vale's portion of the Oxford Green Belt (N Abingdon 800, NW Abingdon 200, NW Radley 240 & S Kennington 270). ☐

☐

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

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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:

This is the only opportunity we have to challenge the SHMA and the employment figures and it is very important to the liberal Democrat Group that they be offered that opportunity- particularly in the context of the infrastructure delivery

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:

17/12/14

Part B – Please use a separate sheet for each representation

Name or Organisation : VOWHDC Liberal Democrat Group

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

Paragraph		Policy	CP 8	Proposals Map	Ref Spatial Strategy for Abingdon on Thames and Oxford Fringe
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input 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.

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The Plan identifies four development sites in the Oxford Green Belt to accommodate 1,510 dwellings. A further 11 sites in the Green Belt are proposed to be removed. This is based on the Vale Council's so-called "local Green Belt Review"; it was no such thing, it was a search for housing sites in the Vale's portion of the Oxford Green Belt. No allocation of sites in the Vale's portion of the Oxford Green Belt should be made until a full joint review of the entirety of the Green Belt is completed by all five Oxfordshire Districts and the County Council.



(continue on a separate sheet/expand box if necessary)

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Remove the four allocated sites in the Oxford Green Belt totalling 1,150 dwellings (N Abingdon 800, NE Abingdon 200, NW Radley 240 & S Kennington 270) and reinstate Green Belt designation for the 11 further sites proposed for removal from the Green Belt. Delete all references to the "local Green Belt Review". □

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

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

It is important to put the argument for an entire Green Belt review

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:

17/12/14

Part B – Please use a separate sheet for each representation

Name or Organisation : VOWHDC Liberal Democrat Group

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4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
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Please mark as appropriate.

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The “local Green Belt Review” (para 5.40, p 62) was no such thing. It was a search for housing sites in the Vale's portion of the Oxford Green Belt. In paragraph 1.21, pages 16-17 of the Local Plan, Strategic Sites & Policies document, the Council sets out how the Vale Council will work with the County Council and the other Oxfordshire District Councils to complete an Oxfordshire-wide Strategic Green Belt Review. No land should be removed from the Vale's portion of the Green Belt and no strategic sites should be allocated until this review is completed. □

(continue on a separate sheet/expand box if necessary)

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Remove the four allocated sites totalling 1,510 dwellings in the Oxford Green Belt(N Abingdon 800, NW Abingdon 200, NW Radley 240 & S Kennington 270) and reinstate to Green Belt designation the further 11 sites proposed for removal from the Green Belt. Delete all references to the "local Green Belt Review". ☐

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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Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

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4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input data-bbox="1222 819 1362 947" type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input data-bbox="1222 976 1362 1039" type="text" value="X"/>

Please mark as appropriate.

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Para 5.29 states in the last sentence, “Botley also functions as a district centre in the Oxford City context”. There is no justification for this sentence. Botley is not part of Oxford City. The district council did not discuss this definition or idea with Oxford City.

As defined by the Local Plan, the population of Botley in the 2011 census was 10,000. The populations of Oxford City’s district centres are between 24,000 and 40,000 so there is no comparison. There is also ribbon retail development along the Botley Road between Oxford City and Botley and this is not the case for the other district centres of Oxford City.

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The sentence “ Botley also functions as a district centre in the Oxford City context” should be removed.

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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:

There has been considerable discussion and planning debate in respect of the Botley Cental area and a local oral representation is desirable.

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:

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Paragraph Policy Proposals Map

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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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Para 5.31 is unnecessary as this is already outlined in paragraph 5.30

Para 5.31 is derived from the details of a particular planning application (P13/V2733/FUL), which was refused in Dec 2014. A private developer, who stands to profit from the details of this policy, actively contributed to policy formation (Core Policy 11, and this paragraph in particular) by lobbying planning policy staff.

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Paragraph 5.31 should be removed.

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The clash of interests of VWHDC as landowner and planning authority has resulted in this section of the Plan to become moulded to suit one particular application.

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Signature:

Date:

17/12/14

Part B – Please use a separate sheet for each representation

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

Paragraph

--

Policy

CP11

Proposals Map

5.3 page 58

4. Do you consider the Local Plan is :

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Yes

☐

No

☐

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

Yes

☐

No

X

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.

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The area defined in Figure 5.3 includes one local church but excludes another. It includes a vicarage, an Extra Care facility for the elderly., and some private housing. These facilities would not normally be described as suitable for retail redevelopment. The boundaries of this area were provided by a land developer, from his plans for development in the area. His planning application included precisely the area red-lined in Fig 5.3. It's not the retail centre of Botley, but something more.

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The red outline in Figure 5.3 should be redefined correctly to reflect the retail centre of Botley. Or removed.

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