

Comment

Consultee	Rachel and Stephen Pickles (830782)
Email Address	[REDACTED]
Address	4 Cumnor Hill Oxford OX2 9HA
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Rachel and Stephen Pickles
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Q1 Do you consider the Local Plan is Legally Compliant? No

Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified) No

If your comment(s) relate to a specific site within a core policy please select this from the drop down list. N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? No

Q4 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.

One of the key policy objectives of the National Planning Policy Framework is to significantly increase the supply of housing (para 47). There is also a pressing need for additional housing in the Vale of White Horse, as demonstrated in the Strategic Housing Market Assessment (2014) and the Vale of White Horse Local Plan with the housing requirement between 2011 and 2031 being 20,560 dwellings.

As many of these dwellings cannot be accommodated on previously developed land, the Council is proposing that many of them will be provided on greenfield sites, including within the Oxford Green Belt and the North Wessex Downs AONB. The Botley Central area as defined on Figure 5.3 currently contains a significant number of residential units including Field House care flats for older people; flats above the current retail units and offices and the Vicarage. However, policy CP11 would allow Botley Centre to be redeveloped without providing any residential units, as clause i only states that residential use may be included. Potentially there could therefore also be a loss of care units for older people, for which, with increasing numbers of older people, there is a pressing need. The proposal is not therefore justified in that it has not been demonstrated to be the most reasonable alternative when judged against the alternatives.

Clause vi would also allow the demolition of Elms Parade, which is a distinctive 1930s shopping parade making a significant contribution to the character of Botley. However, no justification has been provided as to why the demolition of this non designated heritage asset is necessary for the upgrading of Botley Central Area.

Q5 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 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.

A new clause should be included in policy CP11 to state:

'The redevelopment should include the provision of at least the same number of residential units as are currently provided on the site, to include care units for older persons.'

This is to ensure that there is no net loss of residential units, (including older persons accommodation) given the very pressing need for additional housing provision in the Vale, and to meet the aspiration of the NPPF to significantly increase the supply of housing.

Delete clause vi relating to the demolition of Elms Parade as no justification has been provided as to why the loss of this non designated heritage asset is required

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.

Q6 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