



**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

Mrs

Not applicable

First Name

Joyce

Last Name

Huddleston

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

4 St James Road

Line 2

Radley

Line 3

Abingdon

Line 4

Oxfordshire

Post Code

OX143AQ

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

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

Yes

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.

Government guidance issued on 6 March 2014 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'. The Vale of White Horse District Council has not demonstrated that there are 'very exceptional circumstances'.

(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.

The Vale of White Horse DC should justify what the 'very exceptional circumstances' are to justify assigning a large area of green belt in the parish of Radley to housing development in the proposed Local Plan. It should also consider brownfield sites such as Didcot A power station.

**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:

16/12/14

## 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

No

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

Yes

No

☒

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

Yes

No

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The Vale of White Horse District Council has not justified the level of housing required. It has not tested the Oxfordshire Strategic Housing Marketing Assessment (SHMA) and the assumptions it makes. The number of houses planned is not justified by the level of employment opportunities currently available or foreseeable in the near future

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

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The SHMA should be critically examined and the assumptions tested. This work should be made available for public comment before it is accepted.

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16/12/14

## Part B – Please use a separate sheet for each representation

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Paragraph

Policy

Core Policy  
13

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

☒

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

Yes

No

☒

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Government guidance issued on 6 March 2014 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'. The Vale of White Horse District Council has not demonstrated that there are 'very exceptional circumstances'.

Furthermore, the North Abingdon Site east of the Oxford Road towards Peach Croft Farm was not included in the April consultation on the Local Plan and has not been subject to public consultation in the same way as other areas featured in the proposed Local Plan.

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

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The North Abingdon site (Lodge Hill to Peach Croft Farm) should be withdrawn from the Local Plan until a full green belt review is made and subjected to public examination.

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Signature:

[Redacted Signature]

Date:

16/12/14

## Part B – Please use a separate sheet for each representation

Name or Organisation :

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Paragraph

Policy

Core Policy  
7

Proposals Map

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Yes

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The proposed Local Plan does not consider the infrastructure in Radley thoroughly enough and pay sufficient attention to the timing of the implementation of the necessary improvements in advance of work on the proposed housing developments. Radley's roads are narrow and in a poor state of repair, and cannot support much more traffic at peak times. Sugworth Lane in particular is inadequate as there will many more cars from the intended development at Sandford Lane (the so-called South Kennington site) to any new southbound exit to the A34 at Lodge Hill. The junction of Sugworth Lane also requires improvement; it is an accident blackspot with poor sight lines for those turning out onto Kennington Road. The sewerage system in Radley is already failing and must be updated before building any more houses. These aspects have not been considered carefully enough.

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

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The infrastructure plan should be reassessed to consider the existing state of facilities and services, and a timeline to replace them prepared.

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16/12 /14