



**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	Avril	
Last Name	Anson	
Job Title (where relevant)	-	
Organisation (where relevant)	-	
Address Line 1	22 Robinson Rd	
Line 2	Wootton	
Line 3	Boars Hill	
Line 4	Oxford	
Post Code	OX1 5LE	
Telephone Number		
E-mail Address		

Please Note: I would like to be notified about the submission of the plan to the Secretary of State, any recommendation resulting from an independent examination, and whether the local plan is adopted.

Part B – Please use a separate sheet for each representation

Name or Organisation: Dr Avril Anson

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

Paragraph	The whole process of plan development and consultation	Policy	All of the Vale of White Horse Local Plan 2031 Part 1	Proposals Map	
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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 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 local people have not been adequately involved and consulted in the process:

Inadequate liaison with Parish Councils, and inadequate time spans for consultation:

An example: In March 2014, The Vale dropped leaflets into Cumnor and in Wootton parishes, with a note to the Parishes instructing them to deliver them. Both Cumnor and Wootton Parish Councils have stated that they received no forewarning of this, and excessively short times to deliver them round their Parish before the consultation closure date. This is contrary to Para 5.8 on Page 13 of *The Statement of Community Involvement*,

(www.whitehorsedc.gov.uk/sites/default/files/SCI%20ADOPTED%20DEC%2009%20FINAL.pdf).

An example of the lack of consultation. I live in an area where there was a plan to build 200 houses on stunningly beautiful green belt land. I received no notification of the existence of the Plan at the first consultation stage, last year. At the second consultation stage I received a small flier through my door near the end of March 2014 which I put aside just for a couple of days as I was going abroad for a week. By the time I returned on April 7th I had already missed the deadline by 3 days! Even if I had not gone abroad, I only had about a week to read the Plan and prepare a submission. Many others have had similar experiences.

The Vale's document, *Local Plan 2031 Part 1 How to Comment Guidance, Publication Version, Nov 2014* says, "Importantly, you need to be aware this consultation is more formal than in the previous stages of the plan development. Because of this, your comments should be on the proper form" This reads as an instruction - that submissions are required to be on the standard form. This is contrary to Para 5.9 on Page 13 of *The Statement of Community Involvement, adopted Dec 2009*, which states that, "The council will accept written representations via its electronic consultation system, by post,

e-mail or fax, either on a standard form produced for the purpose or by letter (including written reports). Those making representations will be encouraged to use the standard forms although all written comments, however received, will be accepted". Many people, believing they have to use the standard form which is difficult to understand and very off-putting, will not submit their views to the Inspector.

For the above reasons, I believe the Plan is *not legally compliant*.

The report to the Council about the consultation process ignores important procedural and policy challenges, and seriously understates opposition to the proposals, voiced both in the several thousand written comments received, and at the public meetings convened to discuss the plan.

I therefore believe the Plan has *not been positively prepared and is unsound*.

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.

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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, 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:

Dec 16th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation: Dr Avril Anson

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

Paragraph	<input type="text"/>	Policy	Core Policy 13 (Green Belt), 7, 8.	Proposals Map	Eg: Sites 10 and 23 on the Wootton map.
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Lack of consultation on the Green Belt Review:

During the development of the current plan, numerous areas of green belt land all round the Vale were flagged up for potential housing, but then (thankfully) dropped from the plan because of significant opposition or for various other reasons. Initially, people assumed that those sites were 'safe' because the plans to build on them had been dropped. But between the Feb 2014 version of the plan and the current version, the Vale completed a Green Belt Review and now many of those sites have reappeared in the final version of the Vale's Plan, marked for removal from the green belt, though without specific plans to approve immediate building. There has been no opportunity for consultation on this. I see this as the Vale imposing its plans, not by open discussion.

Fig 4.11 of The Local Plan Consultation Housing Delivery Update in Feb 2014 shows 200 houses on the East Wootton Green Belt site¹. This was later rejected following strong opposition. This same site has now reappeared in the Vale's Green Belt Review Phase 3 (see Site 10 on the Wootton map²). despite being found unsuitable for building on a few months previously. If it is unsuitable, what are the exceptional grounds for removing it from the Green Belt now?

In some cases, new Green Belt sites, which never appeared to be under consideration in previous versions of the Plan, have suddenly been marked for removal in the final publication Plan. In Wootton, for example, the Community Centre (only recently built), and the associated sports fields, are now designated to be removed from the green belt², despite protection in the NPPF for Local Green Space, without any announcement or discussion whatsoever, whereas in previous versions of the Wootton area there is no indication of this site being under threat³. Another example of this situation can be found in Cumnor.

Changes of this magnitude and impact on the Green Belt boundaries should have been consulted on and I therefore believe the Plan is *not legally compliant*.

Building on Green Belt land round Oxford Fringe villages:

This will damage the distinctive character, the attractiveness and the historic nature of the villages which fringe Oxford, and add to existing traffic congestion. The historic town of Abingdon-on-Thames has already been swamped with new housing estates and 1,000 more are in the Plan. Radley's calm and ancient ambience would be destroyed by the proposed housing estate. The villages of Old Boars Hill (very charming and historic) and Wootton have almost coalesced and yet there are plans to remove 3 sites from the Green Belt, putting them at future risk. One of these 3 sites in Wootton contains the new Community Centre and sports fields. Similarly, Cumnor's historic beauty is under threat if plans to remove several sites from the Green Belt go ahead. There is an enormous strength of feeling against these plans.

I believe the Plan has *not been positively prepared and is unsound*.

Refs:

- 1) <http://www.whitehorsedc.gov.uk/sites/default/files/Local%20Plan%20housing%20delivery%20update%202014.pdf>.
- 2) Site 23 on the Wootton Map (Page 9) at www.whitehorsedc.gov.uk/sites/default/files/Phase%203%20Report%20Amendments%20to%20Inset%20maps%20November%20%202014_1_0.pdf, Nov 2014.
- 3) Wootton Map in Appendix 26 of the *Consultation Draft of the Local Plan, Feb 2014* at www.whitehorsedc.gov.uk/sites/default/files/Appendix26%20Wootton.pdf.

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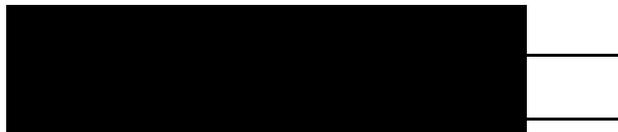
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Date:

Dec 16th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation: Dr Avril Anson

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

Paragraph

Policy

Core Policies 13 and 44

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.

The Local Plan is not in compliance with the European Landscape Convention (ELC):

The ELC was ratified by UK Parliament in 2007 and hence has the full force of Law¹. It is a forward-looking and democratising document, aimed at promoting the highest quality landscape for future generations by protecting special landscapes, by managing and enhancing all landscapes everywhere, and by raising awareness of the value of a living landscape. It concerns landscapes that might be considered outstanding as well as everyday or degraded landscapes.

The ELC says: "All action taken to define, implement and monitor landscape policies should be preceded and accompanied by procedures for participation by members of the public and other relevant stakeholders, with the aim of enabling them to play an active role in formulating, implementing and monitoring landscape quality objectives"².

"A key aspect of the Convention is the active role it assigns the public as regards perception and evaluation of landscape. Awareness-raising is therefore crucial in order to involve the public in decisions affecting the landscape in which they live"³.

The Convention stands above the NPPF and the Local Plan. It is intended to be integrated into all levels of planning policy. The Vale considers that their Local Plan is compliant with the NPPF, and the NPPF is compliant with the ELC, hence the Local Plan is compliant with the ELC, but I argue that this is not the case. The NPPF, whilst incorporating a thread of 'environment' into planning decisions, does not fully incorporate the aims of the ELC. The Vale's Plan gives too much weight to economic growth

at the expense of potential damage to the landscape. The ELC is meant to be a democratising convention, inviting the public to nominate landscapes which are of importance to them, culturally, historically or in other ways, so as to be able to protect and enhance those landscapes. This process has not been applied during the development of the Local Plan. AONBs, the Green Belt, and Local Green Spaces in particular are valued very highly by the Oxfordshire public and should not be put at risk of housing development; the wishes of the public have not been sufficiently taken into account at County Level or at District Level.

For these reasons I believe the Plan is *not legally compliant* and the Vale is putting itself at risk of future prosecution.

Refs:

- 1) <https://www.english-heritage.org.uk/professional/advice/advice-by-topic/landscape-and-areas/european-landscape-convention/>
- 2) www.coe.int/t/dg4/cultureheritage/heritage/landscape/versionsorientation/anglais.pdf
- 3) www.coe.int/t/dg4/cultureheritage/heritage/Landscape/Leaflet_en.pdf

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Part B – Please use a separate sheet for each representation

Name or Organisation: Dr Avril Anson

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

Paragraph	<input type="text"/>	Policy	Core Policy 4 & all others that flow from it, (especially, core Policies 8, 13, 15 & 20).	Proposals Map	<input type="text"/>
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Oxfordshire Strategic Housing Market Assessment (SHMA):

The SHMA figures are unrealistically high and should not be relied upon. This is an absolutely fundamental flaw in the Plan, which invalidates virtually all the core policies that were subsequently developed.

- The SHMA housing need figure is for a 40% (!) increase in housing for the county of Oxfordshire between 2011 and 2031. No county in the south of England can stand that level of increase, plus the associated infrastructure, without serious damage to its character, beautiful landscapes, history, culture and infrastructure. This SHMA figure is two and a half times what the Government's official household projections would suggest, making it highly questionable.
- Within the county, the Vale District SHMA figure is an extraordinary 20,560 new homes over the same period.
- The SHMA figures were developed from the maximum anticipated growth rates, and over-optimistic forecasts of job creation in the Science Vale area.
- The Plan was originally intended to cover the 20-year period from 2011. Since the Plan has not yet been adopted, we have 3 years of actual growth rates from 2011 to 2014, and these are much lower than the SHMA projection. We should be using estimates based on the actual growth rates.
- The SHMA makes many dubious adjustments to official statistics which add over 20,000

houses to its forecast of need for Oxfordshire.

- Much of the forecast of housing need is based on a forecast of 23,000 new jobs in the Vale. This in turn is based on another forecast that 85,000 new jobs will be created, attracting more people to move into the County. However much of this figure seems itself just to be based on questionable hopes of aggressive economic growth, and house building rates, and it has not been subject to public consultation or independent scrutiny. By its very nature, the Science Vale project will attract eminent research scientists. We have very few such scientists resident in Oxfordshire or the UK, so they will mostly have to come from abroad where research of this high calibre is currently centred. So this project will add to the housing need, but not provide large numbers of jobs for Oxfordshire people.

The Vale did not question or challenge the SHMA figures, and common sense alone indicates that such growth rates over such a short time frame will be unsustainable, and permanently damage the quality of life and visual appearance of Oxfordshire and the Vale District.

The SHMA figures have been strongly criticised by the public, organisations (such as CPRE) and politicians alike. In an independent critique of the SHMA, commissioned by CPRE Oxfordshire, a leading planning expert concluded that the SHMA's estimate is likely to be 'grossly overstated' by more than double.

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There is an overwhelming need for a re-examination of the SHMA figures for Oxfordshire, and hence for the Vale, *bearing in mind* the environmental and social constraints as well as more realistic job projections, to come up with realistic, sustainable housing figures. (This might be achieved by an independent panel, consisting of all relevant stakeholders plus appropriate experts.)

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

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The Vale District Council has ignored the environmental and social constraints within the District in deciding its housing targets:

A press release from Pickles and Lewis in Oct 2014¹ says that, "Assessing the housing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, **and in so doing take account of any constraints such as green belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.**"

"This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount", Eric Pickles¹.

In addition, Nick Boles, Planning and Development Minister, in a public letter on 3 March 2014 to Sir Michael Pitt, made it abundantly clear that the government is not encouraging or pressurising local authorities to adjust their Green Belt boundaries for any reason, and certainly not in order to meet housing need. If local authorities choose to alter their Green Belt boundaries, it has to be because they wish to.²

Ed Vaisey in the summer of 2014 publically expressed his concern at the phenomenal housing targets that have been set for Oxfordshire. In a letter to Cllr Sue Roberts he wrote, "I am keen to establish whether this target can be amended, particularly as we have many areas in Oxfordshire which can't be built on, such as the Green Belt and AONB".

The Vale tested sites against the 5 purposes in a Green Belt Review, and during that review **(without public consultation)** they decided that some boundaries could be redrawn - allowing them to allocate 4 sites for strategic housing (1,510 houses), and 18 others to be kept on the back burner for future needs. This completely ignores the absence of any exceptional reason to change boundaries. All the sites meet at least one of the five purposes for Green Belts. Since there are no exceptional circumstances in this case, and in the light of the remarks by Pickles, Lewis, and others, no land should be removed from the Green Belt whether for building on or not.

Since it is legitimate to reduce SHMA figures if otherwise an authority would have to build on Green Belt, AONB and even Local Green Space, why has the Vale chosen not to do so? Instead they have not only designated nearly 3,000 houses to go on Green Belt/AONB sites, but have also released additional land from the green belt, ready for future development.

When asked in a public meeting why the Vale planned to remove 18 additional sites from the Green Belt without building on them (as well as the 4 Green Belt sites designated for 1,510 houses), Matt Barber, Leader of the Vale, said it was in order to avoid looking like it was a land grab for housing! Yet, this is clearly what it is.

The NPPF places AONBs in the highest category of landscape protection and affords them "great weight" in the decision-making process. Further to this, the NPPF confirms that AONBs are one location where restrictions apply to development, and accordingly that, "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest." The proposed developments are not in the public interest and should be rejected.

Given the grossly exaggerated SHMA figures, and the comments above, I can see no valid justification for building on any Areas of Outstanding Natural Beauty, or Green Belt land, or Local Green Space. Nor, indeed, for accepting such huge levels of housing on greenfield sites.

The Vale District Council did not question the SHMA figures. It should first have assessed them against social, environmental and infrastructure considerations. Instead, they went the other way and used them to justify a need to build on valuable and irreplaceable land areas, against the express wishes of the local population and without consideration of the damage it would do. This is a poor approach to planning, with the people having no effective say in the process, and it is not in line with the current Government thinking.

South and West Oxfordshire both have said they will not accept the SHMA figures for their local plans. Why has the Vale?

The Vale's uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty. The plan has identified 4 development sites in the Green Belt to accommodate 1,510 houses, and 2 in the AONB for a total of 1,400 further houses, which is threatening to undermine the rural character of the Vale. A further 18 sites are proposed for removal from the Green Belt. I am very concerned that once land is removed from the Green Belt it will be at imminent risk of development, even if not immediately identified as a strategic site.

For the various reasons above I believe the Plan is *not legally compliant and/or unjustified and unsound*.

Refs:

- 1) <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>
- 2) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/292648/Scan-to-Me_from_ela-mfd-f6-zc1.link.local_2014-03-03_180547.pdf
- 3) http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/#paragraph_044
- 4) http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/#paragraph_044

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There is an overwhelming need for a re-examination of the SHMA figures for Oxfordshire, and hence for the Vale, *bearing in mind* the environmental and social constraints, (and also more realistic job projections), to come up with realistic, sustainable housing figures. (This might be achieved by an independent panel, consisting of all relevant stakeholders plus appropriate experts.)

I request that the Inspector strikes from the Local Plan all site allocations in the Green Belt, in the AONB, and in Local Green Spaces, and rejects the Green Belt Review in its entirety so as to leave the Green Belt boundaries as they were.

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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Signature:



Date:

Part B – Please use a separate sheet for each representation

Name or Organisation: Dr Avril Anson

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

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="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please mark as appropriate.

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There is a lack of appropriate infrastructure to support the Plan as outlined:

I cannot see how public services and infrastructure, such as the road network, which are already overstretched in many places, can possibly be improved within the timescales to meet such a great increase in demand. I do not believe that the District will be able to cope with this level of growth and I am very concerned about the impact it will have on the environment and the countryside.

Infrastructure needs to be in place before more houses are built, as many of our roads are already well above capacity, with traffic at a complete standstill for long periods of time on regular occasions (A34, Botley Road, etc).

I therefore believe the Plan as it currently stands to be *ineffective* and *unsound*.

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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="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 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 Plan is ineffective:

Building very large numbers of houses will not result in more homes becoming available to local people as supply increases and demand drops. Instead, it will attract more people from London to move to Oxfordshire and to commute back to London daily to work. Thus we will damage the environment and increase road pressure without even the benefit of people working within the Vale. The Plan will never be effective whilst so many people from overseas are buying property in London, not to live in themselves, but as an investment. This causes London house prices to rise, which in turn puts up the pressure on Oxfordshire housing, thus making housing less affordable for the local people. In essence, building huge numbers of houses doesn't satisfy the housing need – it just increases the need by attracting more people in from outside the County.

Until this issue is tackled, the Plan will remain *ineffective and hence unsound*.

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.

Given **all** my representations above (not just those on the previous page), I request that drastically reduced housing figures (based more closely on the Government's own household projections) should be used by the Vale in its Local Plan, that the Inspector strikes from the Local Plan all site allocations in the Green Belt and North Wessex Downs, and that the Green Belt Review be rejected so that **no** land is removed from the Green Belt - whether it is to be used for housing or not.

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?

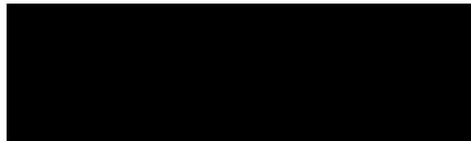
No, I do not wish to participate at the oral examination

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:

Dec 16th 2014