



**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

First Name

Valerie

Last Name

Krol

Job Title

Teacher

(where relevant)

Organisation

(where relevant)

Address Line 1

62 Appleton Road

Line 2

Cumnor

Line 3

Oxford

Line 4

Post Code

OX2 (QH

Telephone Number

E-mail Address

(where relevant)

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

Name or Organisation : Mrs Valerie Krol

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

Paragraph

Policy

1

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

X

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.

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.

These comments refer to Core Policy 1 (Presumption in favour of sustainable development) and all others that flow from it, in particular, Core Policies 4, 8, 13, 15 & 20.

- These policies assume the forecasts of housing need proposed in the Oxfordshire Strategic Housing Market Assessment are correct. It seems that the housing target related to SHMA for Oxfordshire are show a very high forecast which are over inflated and not produced in an objective manner.
- CPRE have shown that the SHMA figures are far too high and could not be sustained. Therefore to base need on such figures is unsound .I fully agree with the CPRE's conclusion that the Oxfordshire SHMA is completely over-inflated and couldn't realistically be implemented.
- Oxfordshire has a large rural element which developers will be eager to exploit if Greenfield land is deregulated and open for building development. Huge pressure will be put upon rural communities such as Cumnor and will detract from regeneration of urban areas and business development. The damage to areas such as Cumnor will be irreversible.

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.

Figures derived from published government housing projections using the most probable values should be used as a base point for all projections not the SHMA overinflated figures.

**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:

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

Name or Organisation : Mrs Valerie Krol

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

Paragraph

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

*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.

These comments refer to the Vale District Council's use of the SHMA figures: Spatial Strategy

The Vale District Council used the SHMA figures to form the basis of the housing strategy. This was before publication of the full SHMA Report. Consequently it failed to meet the requirement of the NPPF for the social, economic and environmental elements of sustainable development.

- The SHMA does not set housing targets. It provides an assessment of the future need for housing. The SHMA failed to address the shortfall for existing infrastructure such as road networks, schools and health facilities and therefore how can the proposed plans be carried out?

*Economic considerations for sustainable development*

- The Plan identifies infrastructure requirements in the proposed sites, but how can they guarantee to meet these requirements considering the time available the limited budget? Road capacity is a huge problem with well-documented overloading on the main roads in the District and on many of the minor roads.

There are major traffic problems on the A34. A40 A420, A338 and, on the A415 and A417.

*Social considerations*

- The CPRE's comments concerning the social and environmental issues are relevant and should be observed.

*Environmental*

- There are huge issues with the removal of green field sites where existing country villages will have their character and historic environment removed forever. Such intrusion of historic sites and villages cannot be replaced once destroyed.

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.

Sites must not be approved until guaranteed provision of medical services is given.

Infrastructure must be able to meet the need which would be caused by massive overbuilding.

***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:



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

Name or Organisation : Mrs Valerie Krol

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

Paragraph

5.28 -5.31

Policy

11

Proposals Map

5.3

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 boundaries of the Botley "Centre" are presented as a red line on a map and a poor description is given.
- The description is completely misleading.
- The plan does not relate to the total area being two quite separate areas. The east part commercial and retail. The west part is residential does not require development. How have the "Centres" boundaries been determined? Without justification these boundaries mean nothing and should not be allowed.

•

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 red outline in Figure 5.3 should be removed and the map should be changed to show the actual position.

Paragraph 5.31 should be removed completely.

**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:



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

Name or Organisation Mrs Valerie Krol

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

Paragraph

Policy

13

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

X

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

Yes

No

X

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

Yes

No

X

*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.

### General comments

- The Plan is inconsistent with planning guidance and government policies on the protection of Green Belts.
- The Government's position on Green Belt policy aims to prevent city sprawl by keeping land open. Boundaries of Green Belts should only be changed in "*exceptional circumstances*", housing need is not an exceptional circumstance.
- The Plan suggests removal of 22 sites from the Green Belt. This is against the Government stated aims.

In areas such as Cumnor, the Vale proposes to go ahead and remove the areas from the green belt. This would then allow for development even though the recent housing proposals were voted against.

In Cumnor eight sites are proposed for removal from the green belt. Why have these areas been selected for removal from the green belt? What evidence based justification is there for these to be removed?

These changes were not properly consulted upon. Residents have not been correctly and sufficiently able to respond to the proposals.

- The leaflet did not give full and detailed explanation to residents about the proposals. There was no mention of the extended 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.

The sites in the Oxford Green Belt that have been identified for housing should not be on the plan.

The green belt review should be removed from the plan.

**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:

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

Name or Organisation : Mrs Valerie Krol

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="X"/>
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 CPRE have given full and valid comments on the Vale Council Core Policy 44: Landscape/Area of Outstanding Natural Beauty and I agree with all the comments made.

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 sites proposed for house building need to be removed and the Plan should be vastly reduced.

**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:

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

Name or Organisation : Mrs Valerie Krol

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

Paragraph

Policy

47

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

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.

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 necessary infrastructure and affordable housing can only be provided if the planned rate of construction and associated sales can be achieved and maintained. The Plan does not explain how this could be overcome.

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 Plan should be changed:

- to show the expected economic and population growth forecasts are correct

**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: