



**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

Mr

First Name

Nikolay

Last Name

Nikolaev

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

78 Gibson Close

Line 2

Abingdon

Line 3

Line 4

Post Code

OX14 1XT

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation : Nikolay Nikolaev (1/3)

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 checked="" 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.

(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.

I wish to object to the draft Local Plan Part One 2031 on the basis that it is not 'sound'.

There has not been any objective quantitative assessment of the impact of the A34 proximity to sites 1 (North-West Abingdon) and 2 (North Abingdon). If such assessment had been carried out it would have established that excessive noise and air pollutions render the sites non-compliant with Strategic Objectivity *"SO 4: Improve the health and well-being of Vale residents, reduce inequality, poverty and social exclusion and improve the safety of the Vale as a District where everyone can feel safe and enjoy life."*

Measurements taken across site 2 on 16/12/2014 indicated spatial average noise level of 80dB with maximum measured level of 84dB. For comparison, exposures to noise at such levels are considered health hazards and employment Health and Safety regulations mandate provisions of hearing protection devices. Why such strong negative factor has been completely ignored by the Sustainability Assessment which qualifies the impact on SO4 as "minor positive"?

I request striking off strategic site allocations 1 (North-West Abingdon) and 2 (North Abingdon) from the Plan and recommend considering alternative sites located sufficiently far from A34 to neutralise the impact of the noise and air pollutions.

Part B – Please use a separate sheet for each representation

Name or Organisation : Nikolay Nikolaev (2/3)

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

Paragraph ☐ Policy ☐ Core Policy 7 – Providing Supporting Infrastructure ☐ 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.

(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.

I wish to object to the draft Local Plan Part One 2031 on the basis that it is not 'sound'.

There has not been any objective quantitative assessment of the infrastructural impact of building more than 1500 new homes on strategic sites 1 (North-West Abingdon), 2 (North Abingdon), 3 (South Kennington), and 4 (North-West Radley) . Should there have been any such assessment it would have made evident that:

- The presentations of these sites in the Sustainability Assessment under SO4 are inadequate and misleading. How it is possible that 1500 new homes will have "*minor positive*" impact on the currently oversubscribed local GP surgeries?
- The Plan does not make any provisions for adequate educational infrastructure to meet the demands of any, let alone 1500, new homes. One new school is only sufficient to meet the current needs for dropping the load level of the oversubscribed local schools and increase the quality of teaching in compliance with SO5 "*Reduce inequality, poverty and social exclusion in the Vale, and raise educational achievement and skills levels*".
- The Plan does not make any provisions for adequate road infrastructure to meet the demand of any, let alone 1500, new homes. Building an extension of Lodge Hill interchange on A34 will only alleviate the current serious traffic problems of Abingdon. Development of more than 1500 new homes on sites 1, 2, 3 and 4 will negate the benefits of building such extension and will contribute to further inner-town traffic flow deterioration.
 - 1) Simple calculations indicate that 1500 new homes can generate up to two hours of continuous non-stop traffic which will leave almost no spare "rush hour" capacity on the access road and will make it impossible inner-town traffic to reach the exchange.
 - 2) "Dunmore road" and "Twelve Acres Drive" are heavily congested during rush hour and have no capacity to absorb the impact of the inevitable speed reduction and additional crossings which will come with the new development, let alone to take the additional flow of hundreds extra cars.

Building 1500 new homes would require very substantial supporting infrastructural development for which the Plan makes no provisions.

I request striking off strategic site sites 1 (North-West Abingdon), 2 (North Abingdon), 3 (South Kennington), and 4 (North-West Radley) from the plan and recommend considering alternative sites located to the West of A34 with easy access to existing diamond interchanges and sufficient space for infrastructural development.

Part B – Please use a separate sheet for each representation

Name or Organisation : Nikolay Nikolaev (3/3)

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

Paragraph

Policy

Core Policy 13 Oxford Green Belt

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.

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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.

I wish to object to the draft Local Plan Part One 2031 on the basis that it is not 'sound'.

Strategic sites 1 (North-West Abingdon), 3 (South Kennington), and 4 (North-West Radley) are located within the boundaries of the Oxford Green Belt. The law clearly states that Green Belt boundaries can be changed only in "exceptional circumstances". The Plan does not state what "exceptional circumstances" have arisen in order to justify such extraordinary choice.

- Meeting artificially inflated local housing need targets is clearly not an "exceptional circumstance"
- There is no evidence that alternative sites located outside of the Green Belt have had any serious consideration, moreover when strategic sites 1, 2, 3 and 4 seem to be inappropriate choice for a number of other reasons.

I request striking off sites 1 (North-West Abingdon), 2 (North Abingdon), 3 (South Kennington), and 4 (North-West Radley) from the Plan and recommend considering alternative sites which:

- Are located outside of the Oxford Green Belt boundaries
- Are located sufficiently far from A34 to eliminate the negative health and well-being impacts
- Are located close enough to the less loaded West sides of the existing diamond interchanges on A34
- Provide enough space for building sufficient high quality infrastructure

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?

X

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:

17/12/2014