



**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

James

Last Name

Krol

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

62 Appleton Road

Line 2

Cumnor

Line 3

Oxford

Line 4

Post Code

OX2 9QH

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation : Mr James 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

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.

Unsoundness and unsustainability of Oxfordshire SHMA

- The projected/forecasted housing needs presented in the Oxfordshire Strategic Housing Market Assessment have not been subjected to independent analysis. I agree with the views expressed by the Campaign for the Protection of Rural England (CPRE) that the SHMA figures are inflated and cannot be relied upon as a basis for future housing needs.

SHMA failure to meet the sustainability requirements of the NPPF

- I support the CPRE's view that the Oxfordshire SHMA is utterly disproportionate and unrealistic. I simply cannot find any evidence that sustainability has been independently and professionally studied/assessed.

I believe; therefore, that the Local Plan is Unsound and Unsustainable

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?

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:

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Signature:

Date:

Part B – Please use a separate sheet for each representation

Name or Organisation : Mr James 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

X

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

Yes

No

Please mark as appropriate.

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Unjustified Prematurity

- The Vale District Council produced a Housing Update based directly and uncritically on the SHMA figures, before the full SHMA Report itself had been published. It; therefore, failed to meet the requirement of the NPPF for the social, economic and environmental elements of sustainable development to be considered together.

Unsustainability

- Road capacity is a major problem on the main roads in the District and on many of the minor roads at the points where they join them. In particular, the A34 and A40 regularly experience major traffic problems. I have, in my 18 years in the area, experienced an unrelenting increase in traffic with the accompanying frustration with long, local journey times. There simply is not enough capacity on the local roads to support the projected housing needs.
- I support the CPRE's comments concerning the social and environmental issues.

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Part B – Please use a separate sheet for each representation

Name or Organisation : Mr James 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="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.

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I do not accept the assertion that Botley is regarded as a 'Central Area' - where is the justification for this? (local people regard Botley as a Local Area). The site boundary proposals are unsound since the accompanying description of the boundaries (Paragraphs 5.28 to 5.31) is misleading and is; therefore, unsound.

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The sentence "Botley also functions as a district centre in the Oxford City context" should be removed.

Paragraph 5.31 should be removed in its entirety.

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Name or Organisation :Mr James Krol

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

Paragraph

Policy

13

Proposals Map

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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

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General comments

- The Plan is inconsistent with planning guidance and government policies on the protection of Green Belts.
- The National Planning Policy Framework sets out Government policy on Green Belts:
"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."
- The Government's position on Green Belt policy is very clear. Boundaries of Green Belts should only be changed in "*exceptional circumstances*", and unmet housing need is **not** an exceptional circumstance to justify taking land out of the Green Belt. The Plan is not sound.

Failure of the Consultation Procedure

These changes were not consulted upon properly.

- The consultation procedure was inadequate in terms of the time and the manner in which it was conducted.

- Parish Councils did not have sufficient time to consult with local residents.
- The Vale has utterly ignored the views of 200 plus individuals in Cumnor who objected to the releases of Green Belt which now appears to have been linked to the development (now removed from the Local Plan 2031) of some 200 houses in Cumnor. This is a complete betrayal of the consultation procedure and demonstrates the Vale's undemocratic reluctance to listen to, and act upon, local opinions/views.

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The sites in the Oxford Green Belt that have been identified for housing should be withdrawn from the Plan.

All reference to the Green Belt Review and its conclusions should be removed from the plan.

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

Please mark as appropriate.

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The absence of 'reasonable alternatives' (Paragraph 1.25)

- The Council asserts that it has tested its preferred solution, as required by the NPPF, against 'reasonable alternatives'. These alternatives applied before the publication of the SHMA and are; therefore, now completely irrelevant. They cannot be described as 'reasonable' and need to be replaced.

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