



Mr Ian Kemp
16 Cross Furlong
Wychbold
Droitwich Spa
Worcestershire
WR9 7TA

5th January 2016

Dear Sir,

RE: Vale of White Horse Local Plan 2031 Part 1 Examination in Public Stage 2 Matter 5

Oxford Preservation Trust ("the Trust") is an established charity and local amenity society with a principle aim of conserving and enhancing Oxford and its setting.

In order to achieve this the Trust works jointly with local authorities and other statutory bodies to provide expert and professional advice on the potential impacts of development on the world renowned and historic city of Oxford. One recent and notable example of this work is the 'Assessment of the Oxford View Cones' produced by OPT in partnership with Oxford City Council and Historic England. This assessment has been used by the Vale of White Horse as part of its evidence base and is part of this examination's library (document BHE02).

The Trust seeks to influence change rather than to stop it, to see an appropriate scale of essential development enabling Oxford to continue to flourish and prosper, whilst protecting its historic character and setting.

As part of this important work, the Trust will be appearing at the Matter 5 – Proposed Revision of Green Belt Boundaries (Including CP13) Vale Local Plan 2013 Examination hearing session.

The Inspector has asked a number of questions in relation to the Council's approach to the Green Belt in its Plan and the Trust wishes to make its position clear on these issues prior to its appearance at the hearing.

Chairman Professor Roger Ainsworth MA, DPhil, FRAeS

Director Deborah Dance, OBE, MSc, MRICS

Charity No 203043 Company No 225839 VAT No 879 0464 82

Do the exceptional circumstances, as required by the NPPF (paragraphs 79-86), exist to justify the plan's proposed revision of the boundaries of the Green Belt, having particular regard to:

(a) Housing Allocation sites 1, 2, 3 and 4?

(b) The land between sites 1 and 2, to the east of the A34?

(c) The land to be removed from the Green Belt but not allocated for any particular use?

The Trust is not persuaded that exceptional circumstances exist to justify the proposed Green Belt boundary revisions. The Council must convince the Inspector that it cannot meet its housing needs without developing in the Green Belt. To amend the Green Belt boundary is a significant step in eroding a statutory planning designation that has protected the historic setting of Oxford for decades.

It is clear through submissions to the Plan from other parties that there is alternative land within the district, which is both suitable and available for development and not in the Green Belt. Sites in Faringdon, elsewhere in Abingdon and the district's larger villages have all been put forward for consideration. The Trust asks the Inspector to [REDACTED] fully before endorsing what are piecemeal incursions in to the Green Belt.

The Trust maintains its view that any changes to the Green Belt boundary should be based on a comprehensive, county-wide Green Belt review. The Oxfordshire Growth Board is in the process of carrying out an Oxfordshire wide Green Belt study, the purpose of which is to provide the Oxfordshire authorities with an evidence base to be used in connection with their Local Plans. . The first part of the study was published in October 2015. It assessed areas of Oxford's Green Belt against the five purposes of the Green Belt as identified in paragraph 80 of the National Planning Policy Framework (NPPF). It is understood that further work is being carried for the Board at the start of 2016.

Until this work is completed and can be used as an effective resource, it is not possible for an Oxfordshire authority to make a fully considered and informed decision on development in the Green Belt.

Is it soundly based for Housing Allocation site 2 to include an area of land designated as Green Belt?

The Trust has no comments to make on this issue at this time.

Does the plan adequately identify the revisions to the Green Belt boundary that it proposes?

The Trust is of the opinion that the plan does not adequately identify the revisions to the Green Belt. It became apparent at the Stage 1 hearing sessions that there is a high level of confusion as to what revisions are proposed to the Green Belt.

When asked at the hearing, the Council could not accurately identify the number of sites proposed for removal from the Green Belt in the various Green Belt studies produced by the Council. This led the Inspector to ask the Council to produce an additional paper to clarify the situation. As a result the Council submitted HEAR03. This document however simply lists sites recommended for release from the Oxford Green Belt in the Vale and shows them on a map. There is no justification for the release of these sites or any detail on what they will be used for.

The Trust considers this unacceptable. In the interests of openness and clarity, the Plan (without an additional background note) needs to be clearer as to the changes it is seeking to make to the Green Belt.

Is Policy CP13 soundly based?

The majority of Policy CP13 repeats Green Belt guidance in the NPPF. However, in light of the above, the Trust does not consider proposals in the Council's Plan to be in-line with its own policy.

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The Trust wishes to make one final point. As part of its work, the Trust owns and manages sizable areas of land in and around Oxford. We have owned land at Kennington since the 1940s and now own some 125 acres, shown on the attached plan. The Trust would have ideally attended Session 8, to make our case, but understand that this is not possible. It therefore wishes to convey its concerns to the Inspector over the potential negative impacts that development on Site 3 will have on its land and its ability to protect the historic setting of Oxford. Moreover, this proposed allocation (as well as the proposed allocation at Radley) sets a dangerous precedent for 'land grabbing' on the edge of villages set within Oxford's Green Belt and is contrary to one of the principle objectives of Green Belt policy; namely, to preserve its openness. This is in conflict with national Green Belt policy in the NPPF and the Council's own Green Belt policy.

If the Inspector has any questions about the points raised in this letter, please do not hesitate to contact me.

Yours sincerely

A black rectangular redaction box covering the signature of Debbie Dance.

Debbie Dance
Director

Cc Jon Waite, Senior Planner, Kemp & Kemp LLP

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