

## Comment

<b>Consultee</b>	Professor Basil Crowley (871802)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	3 Shaws Copse Radley Abingdon OX14 3GZ
<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Professor Basil Crowley
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**Q1 Do you consider the Local Plan is Legally Compliant?** No

**Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)** No

**If your comment(s) relate to a specific site within a core policy please select this from the drop down list.** N/A

**Q4 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 National Planning Policy Framework (NPPF) makes it clear that a Green Belt boundary should only be altered in 'exceptional circumstances'. Government guidance (6<sup>th</sup> March 2014) states that 'Unmet housing need is unlikely to outweigh the harm to the green belt and other harm to constitute the 'very exceptional circumstances' justifying inappropriate development on a site within the Green Belt?

The NPPF is also specific that AONBs are another particular 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.? In this case, housing need does not constitute an exceptional circumstance, and damaging any AONB for such a reason would not be in the public interest.

Compliance with the NPPF and government guidance are required by Core Policy 2.

**Q5 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 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 amended to comply with the NPPF and accompanying guidance, by striking sites of proposed development in the Green Belt and any AONB 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.***

**Q6 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