

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dr Rosamond Hall
Comment ID	LPPub20
Response Date	23/11/14 18:29
Consultation Point	Core Policy 13: The Oxford Green Belt ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.2

**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.** North West of Abingdon-on-Thames

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

**Q3 Do you consider the Local Plan complies with the Duty to Co-operate?** No

**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.**

1. The SHMA is unsound and unsustainable and should not be relied upon. The Local Plan is based on the exceptionally high forecasts of housing need from the controversial Oxfordshire Strategic Housing Market Assessment (SHMA), which has been much criticised by the public, organisations

(such as CPRE Oxfordshire) and politicians alike. In an independent critique of the SHMA a leading planning expert concluded that the SHMA's estimate is 'grossly overstated' by a factor of more than two. There has been no response to these criticisms or any attempt to instigate an independent review of the SHMA, and there is no evidence that the Council has given them appropriate consideration.

2. The SHMA itself says it is just a starting point and only part of the evidence base for determining housing need and that further work needs to be done to test whether it can be accommodated sustainably before adopting it as a housing target. The Vale District Council did not attempt to undertake this further work before adopting the SHMA figures unquestioningly; it should first have assessed them against social, environmental and infrastructure considerations.

3. The Vale's uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty (AONB). The plan has identified four development sites in the Green Belt to accommodate 1,510 houses, and two in the AONB for a total of 1,400 houses, which is threatening to undermine the rural character of the Vale.

A further 11 sites (including four around Cumnor) are proposed for removal from the Green Belt. It is a major concern that once land is removed from the Green Belt it will be at imminent risk of development, even if not immediately identified as a strategic site.

4. The Plan is inconsistent with planning guidance and government policies on the protection of Green Belts. The National Planning Policy Framework (NPPF) makes it very clear that a Green Belt boundary may be altered only in 'exceptional circumstances'. Moreover, recent guidance (6 March 2014) states that: 'Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt.' The Government's position on Green Belt policy, therefore, is very clear. The fundamental aim remains to prevent urban sprawl by keeping land permanently open. 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.

5. There is a lack of appropriate infrastructure to support the Plan as outlined. It is hard to see how public services and infrastructure, such as the road network, which are already over-stretched in many places can possibly be improved within the timescales to meet such a great increase in demand. It is unlikely that the Vale District will be able to cope with this level of growth and there is great concern about the impact it will have on the environment and the countryside.

6. The consultation process has been poor. The report to the Council about the consultation process ignores important procedural and policy challenges, and seriously understates opposition to the proposals voiced both in the several thousand written comments received and at the public meetings convened to discuss the plan.

**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 so that no areas are removed from the Green Belt for the reasons highlighted above

**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