

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mrs Lucille Peel
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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

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.

-Firstly there is no options to pick out ?Cumnor? as the area in question in the menu of the online comments , leaving only ?N/A? as the area in question. This is inadequate in itself.

- Inadequate time given for people to respond, approx. 6 weeks in total .
- Very Bad timing, near Christmas when people are busy with other things.
- Very difficult website to navigate will put many respondents off.
- Voluminous information, too much to wade through.
- Language used is too complex and technical.
- In fact I have been asked to assist neighbours on 3 separate occasions because they simply do not understand the forms and how to respond
- Consequences of Green Belt removal not clearly pointed out- i.e. development is the likely outcome.
- There is no democratic process in play here, and for the reasons above, the Vale is operating in a very underhand way. The legal grounds for this has to be questionable. _

There are 5 Green Belt sites around the village of Cumnor targeted for removal from the green belt. The targeting and approach to determine these areas has been very inconsistent and deeply flawed. It is clear that no human being has visited the sites and this has been a paper exercise or perhaps a google earth exercise where a simple circle has been drawn around the village and any space without houses is target for development. The removal of green belt protection around Cumnor will lead to development and on this scale will destroy a rural village forever and turn it into a characterless Oxford suburb. Despite the need for housing and all the fancy design guides, filling spaces is not good planning and will inevitably homogenise and remove all character from the village.

Five Green belt sites around Cumnor have suddenly resurrected themselves in the plan without any explanation or any consultation.

- 1 The previous Green Belt review deemed sites 4 & 5 inappropriate as they lay within the Cumnor Conservation Area and therefore *?removing them from the Green Belt would serve no purpose?*, so how is this back in for removal?
- 2 The previous draft of the Local Plan Part 1 did not include the removal of Green Belt sites around Cumnor, other than for the site identified for housing, which was subsequently dropped. Therefore **this is the first opportunity to provide response to this. On that basis there has been no public consultation on these sites.**
- 3 The South Cumnor strategic sites (numbers 6 & 24) have already been withdrawn from the Plan because of unsuitability for housing but now have miraculously found their way back in.
- 4 These areas 6 & 24 also now appear to omit a small parcel of land from green belt removal that they didn't before. So it appears something has changed even with the intended areas, but how exactly and for what purpose?. Again, no reason has been given for the change and no consultation This again appears underhand and unsound
- 5 Inside the proposed sites for Green Belt removal there are 2 recreational facilities which are at the heart of the village community, a very successful cricket club/field and a football field, both of which host multiple village teams. Removal of these parcels would inevitably mean the loss of these facilities and actually contradict Vale of White Horse councils previous comments on strategic site 8 (Botley) in its green belt review of Spring 2014. It stated *?This site incorporates playing fields, which the council would not support for redevelopment unless alternative provision was made.? Why should there be different rules for different sites ?*

- 1 **Completely inconsistent to the NPPF position that ?Green Belts should only be altered in exceptional circumstances?**
- 2 **Contrary to clear Government Guidance reaffirmed in March 2014 by Nick Boles**
?We are re-affirming green Belt protection, noting that unmet housing need is unlikely to outweigh harm to the green Belt and other harm to constitute very special circumstances justifying inappropriate development?

How does removal of green belt in Cumnor and the consequential development constitute very special circumstances?

- 1 **Undermines and is contrary to the five purposes of the Green Belt :**
to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and

special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

If the 5 sites around Cumnor were released from Green Belt, a very large number of houses would ensue with the filling in of all space in the village. This would easily double the size of the village and be counter to all the five purpose. In particular, the special character of the village would be lost forever.

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.

Need full public and open consultation process, there has not been one yet as it relates to these sites around Cumnor.

Need to have the multiple inconsistencies in the plan fully explained

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