

## Comment

<b>Consultee</b>	Mr Tim Pottle (828703)
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<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Mr Tim Pottle
<b>Comment ID</b>	LPPub540
<b>Response Date</b>	16/12/14 22:15
<b>Consultation Point</b>	Core Policy 13: The Oxford Green Belt ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	Cumnor Parcel 3
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	Yes
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	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.**

Firstly there isn't even a drop-down option in the comments section which relates to Cumnor which is an area that is targetted for removal from the greenbelt.

The VOWHDC's approach and proposal to remove high-grade agricultural land from 5 sites around Cumnor (OX2) from the greenbelt is flawedm inconsistent and unsound and the consultation process is un-democratic, verging on despotic.

The reason for removal of the land from the greenbelt in Cumnor is clear - the VOWHDC wishes to ultimately allow housing development on this land. I therefore appeal to the inspector not to rely on bureaucratic technicalities and to assess these proposals for what they are rather than what they purport to be

a) "Green Belts should only be altered in exceptional circumstances" (NPPF)

It states :- Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

The Vale of White Horse council is misrepresenting the meaning of this sentence. It does not mean that the review of the Local Plan is sufficiently exceptional to justify a change to the Green Belt, but that the circumstances themselves have to be exceptional, and in addition the process needs to be as part of the Local Plan review which it has not.

B) Inconsistent with clear Government direction

Nicholas Boles guidance to local councils on protection of the Green Belt in a letter to parliament on 6/3/14 read as follows:-

?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?

C) Breaches 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 to be released from the Green Belt it is likely that Cumnor would double in size. This would be counter to all the five purposes of the Green Belt. If the 5 sites around Cumnor were released from Green Belt, a conservative estimate would suggest an addition of a minimum of 500 houses. This would easily double the size of the village and be counter to all the five purposes.

D) Totally inconsistent treatment of Green belt sites around Cumnor without any explanation or adequate consultation.

Five sites around Cumnor village are proposed for removal from the Green Belt without explanation as to why this is necessary.

1) 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.

2) The South Cumnor strategic site (numbers 6 & 24) has already been withdrawn from the Plan because of its unsuitability for housing but now re-inserted as a green belt removal. What is the justification for removing these portions of land from the green belt if they are both deemed unsuitable for development ?

3) The 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?

4) Site 3 abuts the very busy A420 and would remove the clear break between the village and the road. The inclusion of this site would adversely affect the view from Wytham Woods towards Cumnor which is currently clear of housing.

5) There are 2 recreational facilities within the proposed areas for removal from Green belt, namely a football field which hosts multiple village teams and a very successful Cricket club and field. Removal of these parcels would contradict Vale of White Horse councils own 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 the treatment of green belt with playing facilities in Cumnor be different and with all available land released for development, there would be no alternatives for playing fields.

**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.**

1. A proper public consultation & review on this green belt area. There has not been one.
2. A clear explanation of the exceptional circumstances which justify the removal of portions of land from the green belt.
3. Proper assessment of deliverability especially with regard to infrastructure, taking into account specific local characteristics (example one-way roads incapable of handling more traffic)

**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?** Yes - I wish to participate at the oral examination

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

I want to ensure that the character of Cumnor Village is conserved and that land is not inappropriately removed from the the green belt with absolutely no justification or proper process.

**Please upload any supporting information**

Cumnor Parcel 3  
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High grade agricultural land - the A420 is beyond the fence and hedge line and is in a cutting.