



## Vale of White Horse Local Plan Part One: Strategic Sites and Policies

### Publication Stage Representation Form

Ref:  
**(For official use only)**

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

### 2. Agent's Details (if applicable)

Title	Mrs	
First Name	Fiona	
Last Name	Newton	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	6 The Glebe	
Line 2	Cumnor	
Line 3	Oxfordshire	
Line 4		
Post Code	OX2 9QA	
Telephone Number	[REDACTED]	
E-mail Address (where relevant)	[REDACTED]	

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="Page 38"/>	Policy	<input type="text" value="4"/>	Proposals Map	<input type="text" value="Page 35 Figure 4.2"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input checked="" type="text"/> x
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

*Please mark as appropriate.*

5. 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.

I believe the Local Plan is not sound as it is not justified. The SHMA (Strategic Housing Market Assessment) is by its own admission an estimate and to be validated through further assessment. The SHMA figures are 2.5 times the Government's official projections. In addition the figures are based upon jobs being created in the South of the Vale – not within the Cumnor catchment area, and therefore does not provide a "purpose" for housing need nor the removal of Green belt status.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

I believe that removing the Green Belt status from this village is not sound, therefore in order to make the Local Plan sound – this re-designation **should not** happen.

**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.**

7. 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

**Yes**, I wish to participate at the oral examination

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

[Large empty rectangular box for writing]

**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.

Signature:

[Redacted signature box]

Date:

15<sup>th</sup> December  
2014

## **Part B – Please use a separate sheet for each representation**

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Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input checked="" type="text"/> x
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*Please mark as appropriate.*

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The removal of Green Belt status from the surrounding areas of Cumnor is not sound nor justified.

1.

The NPPF states that ‘Green belts should only be altered in exceptional circumstances’. This statement has been supported at the highest levels of Government, see Nick Boles statement 6/3/14 “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”

The removal of the Green Belt is not part of the Strategic Plan. The Cumnor sites (6 & 24) were removed from the Strategic Plan due to the sites’ unsuitability for housing. Sites 4 & 5 are inappropriate as they lie within the Cumnor Conservation Area. As these sites have already been deemed to be inappropriate and unsuitable for housing, it cannot be considered to be an “exceptional circumstance” as there is no purpose to removing these sites from Green Belt status.

Furthermore, the review process needs to be “**through the preparation or review of the Local Plan.**” This is not the case here, therefore it is a non-compliant process.

2.

The removal of these sites from the Green Belt breaches the 5 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 sites are taken out of the Green Belt this would lead to speculative development – possibly to meet the 1696 houses allocated to the Local Plan Part 2. By taking away the protection of the site abutting the A420, any development would lead to the merging of Cumnor Hill, Botley and Cumnor Village. The village would become a suburb of Oxford City losing its historic character. Two of the sites currently are home to the local thriving Cumnor Minors Football teams, and the Cumnor Cricket Club, as well as having fitness equipment and providing space for children to grow and play.

3.

The Vale’s own documentation says that development would only be appropriate “within the existing built area of the village” (Page 63 of the revised Plan). The proposed areas clearly lie outside the current built area of the village. Therefore this plan is not sound.

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To make the Local Plan legally compliant, the sites around Cumnor must stay as Green Belt.

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X

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2014

## Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	Page 46	Policy	7	Proposals Map	N/A
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4. Do you consider the Local Plan is :

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There is a lack of appropriate infrastructure to support the Plan, therefore the plan cannot be deemed sound.

- 1) The A34 is unable to cope with the volume of traffic as it is. Each day I sit in the Botley Interchange traffic for on average 23 minutes to get through a 100 m stretch of road. I then queue on the A34 where it takes me on average 35 mins to do a 15 min journey. The jobs proposed are in Harwell and the South of the Vale. Development in Cumnor would equal massive increases in traffic on the A34. The infrastructure is breaking at the seams, and the recent announcement of £50 million investment is not going to ease the traffic in and around the West Oxford flows of traffic.
- 2) Access to 4 out of the 5 sites would be via a single lane one-way route through the centre of the village which runs past the village school and is already deemed dangerous and inadequate at current traffic levels. Proximity of property on either side of this route and the village layout means widening/alternative routes are not viable.
- 3) Doctors facilities are already at capacity at the local Botley centre
- 4) The local primary school has only one class per year and is already at capacity. The local secondary school is also at capacity with the land around it earmarked for housing, thus would be unable to expand. Do you want the children from West Oxford travelling to North Oxford – this would again massively increase congestion.

6. 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 at 5 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.

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