

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dr Christopher Prior
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Q1 Do you consider the Local Plan is Legally Compliant? Yes

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.

This submission refers to proposals for the village of **Cumnor**, which is not identified as a specific option in the drop-down menu. The VoWH Local Plan proposes to remove five sites from the Green

Belt around Cumnor village. The loss of protection will inevitably lead to development, possibly inappropriate, bringing with it a loss of village character and rural identity.

The proposals to remove the Green Belt are widely seen as going beyond Government guidelines, the arguments are flawed and the development of these aspects of the plans are contradictory. Cumnor is an historic village, in a rural setting. The Green Belt provides protection from development - as the principle of a green belt should - and ensures the village character is maintained. No resident wishes Cumnor to be turned into a small town or lose its character as a suburb of Oxford.

As a result of consultation earlier in 2014, plans to build houses on some of the Green Belt areas around Cumnor were withdrawn. Areas 4 and 5, which are in the Cumnor Conservation Area, were considered inappropriate and the review states 'removing them from the Green Belt would serve no purpose'. The South Cumnor site (areas 6 and 24) was deemed unsuitable for housing. The fifth site serves as a buffer between the village and the busy A420, and would lose its purpose if targeted for development. Since the Vale has no plans for building on most of these areas, it is contradictory to propose their removal from the Green Belt now. The reason at this stage can only be speculative views about longer term housing needs. Given that there are already questions over the precise number of houses needed by 2031, it is illogical and potentially damaging to withdraw protection in the meantime, which would allow any developer an open path to destroy the nature of the village.

The reasons for withdrawing the housing plans are strong justification for preserving the Green Belt. They were given as: the infrastructure of the village could not handle the increase of 50% planned, the loss of wildlife and damage to the environment and the rural structure, the impact on an already congested road network. There is historical interest in that areas in line to be removed from the Green Belt include the ruins of Cumnor Place and an Anglo-Saxon ridge-and-furrow field; they also include recreational areas, such as the village cricket and football pitches. The proposals amount to drawing a circle round the existing village and removing green belt status from the interior, thereby opening up to development any space that is at present not occupied by housing. There has been no consideration for the nature of the areas, their relation to the community, nor an assessment of their viability for housing compared with their recreational or environmental importance as a part of the village as a whole.

In letters dated 3rd March 2014 to the Chief Executive of the Planning Inspectorate, and 10th March 2014 to Members of the House of Commons, the Minister for Planning expressed concern at widespread misinterpretation of government policy on the Green belt and misunderstanding by local authorities in preparing policies for their draft plans. He stressed the need to maintain key protections for the countryside and made clear that 'a **Green Belt boundary may be altered only in exceptional circumstances**'. An additional letter on 6th March notes 'that unmet housing need is unlikely to outweigh harm to the Green Belt' and will not 'constitute the very special circumstances justifying inappropriate development'. There can be no valid 'exceptional circumstances' in the case of Cumnor, indeed there is every reason to maintain its Green Belt, as was acknowledged by the Council in its report of 14th October 2014.

While appreciating that in some areas, the presence of the Green Belt has become unnecessarily restrictive to the needs of economic growth and development, any changes should only be carried out if there is no viable alternative. Not only are the Minister's letters a clear indication of Government policy, but the definition of the Green Belt identifies specific purposes that the legislation had at its heart:

- 1 To check the unrestricted sprawl of large built-up areas;
- 2 To prevent neighbouring towns merging into one another;
- 3 To assist in safeguarding the countryside from encroachment;
- 4 To preserve the setting and special character of historic towns;

The removal of the Green belt around Cumnor would violate all of these. There is a very serious concern that the combined effect of plans for Cumnor, Wootton, Kennington and other villages through to Abingdon, could result in Oxford expanding to encompass the entire area. Just removing the five sites around Cumnor could lead to the addition of at least 500 houses, which would double the size of the village, lead to loss of identity and violate the principles above.

It is iniquitous that, having proposed housing that has subsequently been considered inappropriate and been withdrawn from the plans, the Council now seeks to remove from the village all Green Belt status. Cumnor's Green Belt should be preserved to prevent arbitrary, piecemeal development while structured development takes place in more suitable locations.

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 Green Belt issue is of prime concern throughout the whole county. Communities were not informed of the proposals until very late and many people remain unaware of the plans and the resulting impact on their lives. Many of us in Cumnor found out only by word of mouth. There needs urgently to be a proper public consultation on the principle of the Green Belt in general, and specifically on plans for changing the status of areas in particular villages. There should be some higher-level Government input into such a review.

***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