

Comment

Consultee	Mr Philip Pullman (872437)
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Address	Burnt House Farm 25 High Street Cumnor OX2 9QD
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Philip Pullman
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Consultation Point	Core Policy 13: The Oxford Green Belt (View)
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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. 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.

The proposed removal of Green Belt status for several sites in this area contradicts an important statement in the National Planning Policy Framework, which says that Green Belts should only be altered 'in exceptional circumstances'. The circumstances surrounding the Local Plan 2031 are not

exceptional. The presumption should be in favour of preserving the Green Belt, not of allowing it to be altered in the service of a need that has not been proved. The Planning Minister, Nick Boles, stated in a letter of 10 March 2014 that the government is 'Re-affirming the importance of Green Belt protection and ensuring its robust safeguards are not undermined when assessing unmet housing need.'

The Strategic Housing Market Assessment in the Local Plan is flawed, and cannot be used to justify the removal of Green Belt status. Its assessment of the need for new housing is inflated by several assumptions, as set out in an independent review of the SHMA by Professor Alan Wenban-Smith, entitled 'Usound and Unsustainable - why the SHMA will increase greenfield use but not meet housing needs.' (May 2014). It points out that the SHMA figures are more than 2.5 times the official projections. Furthermore, the SHMA replaces national statistics for Oxford City with a local estimate projected forward unrealistically for 20 years. Another flaw is its confusion of the Local Economic Partnership's development proposals for Oxfordshire with a sound economic forecast. Planning proposals approved on the basis of this assessment will be disproportionately sited in greenfield areas, which developers naturally prefer, to the detriment of the open landscape at the heart of Green Belt policy.

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 proposed removal of Green Belt status from the sites identified in the Plan should be cancelled. The SHMA should be reassessed on a more realistic basis, with a presumption of protection for Green Belt sites.

Furthermore, this whole process has been very poorly explained to the public, and the process of responding has been extraordinarily difficult. The website allowing public response should be completely redesigned and made user-friendly rather than rebarbatively difficult. It should be begun again with far better website design advice, and a policy of full and timely explanation to the public.

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