

Comment

Consultee	Mr Stuart Lovegrove (868665)
Email Address	
Address	6 Severn Road Chilton Didcot OX11 0PW
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Stuart Lovegrove
Comment ID	LPPub31
Response Date	30/11/14 15:20
Consultation Point	Core Policy 13: The Oxford Green Belt (View)
Status	Submitted
Submission Type	Web
Version	0.9
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.	East Harwell Campus (Harwell and Chilton Parishes)
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.

Re: Core Policy 13 Oxford Green Belt & Core Policy 8 ? Spatial Strategy for Abingdon & Oxford fringe Sub Area

- 1 **The Vale's uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty (AONB)** . The plan has identified four development sites in the Green Belt to accommodate 1,510 houses, and two in the AONB for a total of 1,400 houses, which is threatening to undermine the rural character of the Vale.

A further 11 sites are proposed for removal from the Green Belt. I am concerned that once land is removed from the Green Belt it will be at imminent risk of development, even if not immediately identified as a strategic site.

Green Belt

The Plan is inconsistent with planning guidance and government policies on the protection of Green Belts. The National Planning Policy Framework (NPPF) makes it very clear that a Green Belt boundary may be altered only in "exceptional circumstances".

Moreover, recent guidance (6 March 2014) states that: "Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt."

The Government's position on Green Belt policy, therefore, is very clear. The fundamental aim remains to prevent urban sprawl by keeping land permanently open. Boundaries of Green Belts should only be changed in "exceptional circumstances", and unmet housing need is not an exceptional circumstance to justify taking land out of the Green Belt.

For the above reasons, I consider the Plan to be unsound because it is not justified by robust evidence.

Consequently, I request that much lower housing figures (based more closely on the Government's own household projections) should be used by the Vale in its Local Plan, and that the Inspector strikes from the Local Plan all site allocations in the Green Belt and North Wessex Downs.

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.

Review the SMHA and adjust figures accordingly.

Give proper consideration to the environmental and social constraints within the District.

Remove erroneous allocation of housing to green belt and AONB

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