



**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

Dr.

First Name

Gerard

Last Name

Ledger

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

27 Western Road

Line 2

Oxford

Line 3

Line 4

Post Code

OX1 4LF

Telephone Number

E-mail Address

(where relevant)

## 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

No

4.(2) Sound (Positively Prepared,  
Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-  
operate

Yes

No

*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.

The proposed Local Plan is essentially a means of reducing the Green Belt to allow development on land that is to be re-classified as being outside the limit of previously defined Green Belt. The areas of land selected were originally included because they satisfied specific criteria. These criteria are set out in the NPPF document of March 2012, para 80.

80. Green Belt serves five purposes:

- 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.

It is quite clear that the land selected for re-classification in these proposals that is in and adjacent to Cumnor was originally only included in the Green Belt because it satisfied the third criterion. This situation has not changed, these parcels of land assist in safeguarding the countryside from encroachment. If they were originally included for that purpose, what justification can there be for now removing them, as clearly the other criteria do not apply in this case? The need to safeguard the countryside from encroachment is just as pressing then as it is now.

Bearing in mind the large scale nature of these changes, taken across Oxfordshire and Berkshire generally, it is surprising how little public consultation there has been. In the case of Cumnor there has been no consultation with the parish council in the preparation of the local plan. The report prepared by Kirkham Landscape Planning Ltd / Terra Firma Consultancy involved no local consultation with Cumnor residents or their representatives.

It is also evident that no consideration has been given to the environmental impact that these changes would have on the area. Has any environmental impact survey been proposed? There are additional problems that would arise due to the scale of the developments and the lack of infra structure to support them. No consideration has been given to any of this in the proposed local plan, or in the report prepared by Kirkham Landscape Planning Ltd / Terra Firma Consultancy.

Since these proposed changes are mainly to allow future development, it is worth noting that government policy does not permit changes to the Green Belt except in exceptional circumstances. Ministerial policy does not accept that increased housing need constitutes exceptional circumstances. Para 82 of the NPPF document states:

If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.

It does not appear that the Vale proposed Local Plan makes any attempt to follow these NPPF guidelines.

I consider that the violation of the rules laid down for changes to the Green Belt, the failure to consult local communities and the clear lack of democratic accountability render the proposed Local Plan unacceptable and if it were to be passed it could clearly be liable on many grounds to be challenged by a judicial review.

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.

It is doubtful if sufficient changes could be made to make the document legally compliant, since so many villages are affected. However with regards to Cumnor, it should be stated that no Green Belt boundary changes will be made in or around the village. It should also state that land packets 4,5,6 and 24 identified in the Green Belt Review will remain within the Green Belt.

**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?

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**No**, I do not wish to participate at the oral examination

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**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: ☐

**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:

Date:

18/12/2014