

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dr Rosamond Hall
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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 draft local plan made no mention of removing all areas inset within the village of Cumnor from the green belt and therefore there was no opportunity for the public or other interested parties to comment on this in the consultation on the draft local plan. One of the stipulations of a Local Plan is that it must

be open to public comment and as this aspect was not included in the draft plan it does not meet this criteria and therefore has no place in the version of the plan that is going forward to the secretary of state for approval

The whole approach and proposal to remove the 5 Green Belt sites around the village of Cumnor is deeply flawed, inconsistent and unsound. If implemented, the removal of this green belt will destroy a rural village forever and turn it into a characterless Oxford suburb.

(At this point an appeal to the inspector not to hide behind bureaucratic technicalities. The removal of green-belt will in this area will inevitably lead to development)

A) Contrary to the NPPF position that 'Green Belts should only be altered in exceptional circumstances'?

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It states :- Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan . At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

The Vale of White Horse council is misinterpreting the meaning of this sentence. It does not mean that the review of the Local Plan is sufficiently exceptional to justify a change to the Green Belt, but that the circumstances themselves have to be exceptional, and in addition the process needs to be as part of the Local Plan review which it has not.

B) Inconsistent with clear Government direction Nick Boles guidance to local councils on protection of the Green Belt in a letter to parliament on 6/3/14 read as follows:-

'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?'

How does removal of green belt in Cumnor and the consequential development constitute very special circumstances?

C) Breaches the five 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 5 sites around Cumnor were released from Green Belt, a conservative estimate would suggest an addition of a minimum of 500 houses. This would easily double the size of the village and be counter to all the five purposes. In particular, the special character of the village would be lost forever.

D) Totally inconsistent treatment of Green belt sites around Cumnor without any explanation or adequate consultation.

Five sites around Cumnor village are proposed for removal from the Green Belt without explanation as to why this is necessary.

1) The previous draft of the Local Plan Part 1 did not include the removal of Green Belt sites around Cumnor, other than for the site identified for housing, which was subsequently dropped. Therefore this is the first opportunity to provide response to this. On that basis there has been no public consultation on these sites.

2) The South Cumnor strategic site (numbers 6 & 24) has already been withdrawn from the Plan because of its unsuitability for housing but now re-inserted Removed from the housing plan but re-instated as a green belt removal. How can this be if it has been deemed unsuitable?

3) The Green Belt review deemed sites 4 & 5 inappropriate as they lay within the Cumnor Conservation Area and therefore 'removing them from the Green Belt would serve no purpose?', so how is this back in for removal?

4) Site 3 abuts the very busy A420 and would remove the clear break between the village and the road.

5) There are 2 recreational facilities within the proposed areas for removal from Green belt, namely a football field which hosts multiple village teams and a very successful Cricket club and field. Removal of these parcels would contradict Vale of White Horse councils owns comments on strategic site 8 (Botley) in its green belt review of Spring 2014. It stated ?This site incorporates playing fields, which the council would not support for redevelopment unless alternative provision was made.? Why should the treatment of green belt with playing facilities in Cumnor be different and with all available land released for development, there would be no alternatives for playing fields.

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**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.**

1. A proper public consultation & review on this green belt area. There has not been one 2. Proper assessment of deliverability especially with regard to infrastructure, taking into account specific local characteristics (example one-way roads incapable of handling more traffic)

***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