



**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 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

Edward

Last Name

Impey

Job Title

n/a

(where relevant)

Organisation

n/a

(where relevant)

Address Line 1

46 College Road

Line 2

Reading

Line 3

Line 4

[brought up in Cumnor, with family still resident, frequent visitor]

Post Code

RG6 1QB

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

4, 7, and
13

Proposals Map

4.2, 4.2, 5.1

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

yes

No

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

Yes

No

no

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

Yes

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.

SHMA is based on what? Wholly unbelievable, and over 2 times the Government's official projections.

(continue on a separate sheet/expand box if necessary)

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.

Start again with the SHMA, consulting properly, taking independent advice and based on realistic growth expectations.

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?

☐ NO

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

☐ **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:

Part B – Please use a separate sheet for each representation

Name or Organisation :

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Paragraph

Policy

Proposals Map

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

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Please mark as appropriate.

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- Transport. Would depend heavily on the A34 – one of the most over-used roads in

- England. Entry/egress from four of the proposed sites would be on to a one-way street – dangerous and impractical. Roads can't be widened.
- Construction traffic - the **thousands of heavy lorry and plant movements** would certainly damage the fabric of buildings bordering Cumnor's streets – especially the Abingdon Road and High Street, to the point possibly of structural collapse (this is a REAL issue).
- Schools, doctors, other services and infrastructure? How would these cope with the vast increase in population implied? They couldn't begin to. The answer is not Section 109 agreements, which as we all know are so often not fulfilled and in any case inadequate.

(continue on a separate sheet/expand box if necessary)

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- A proper, responsible assessment of infrastructure capacity and future need.
- A proper, responsible consultation - a real one – on the green belt issue.

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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	<input type="text" value="Yes"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text" value="no"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="n/a"/>	No	<input type="text"/>

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.

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Removal of greenbelt status as proposed – with the inevitable development that will follow – will change Cumnor beyond recognition. It wouldn't then be a village, but a suburb of Oxford – exactly the kind of effect that greenbelt was introduced to avoid. In more detail as follows:

1. Crucially, the proposal flies in the face of the NPPF statement that “Green Belts should only be altered in exceptional circumstances”. Or, in full, that ‘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 proposal relies on a misinterpretation of this section, which does not mean that the extent of the review of the Local Plan can be exceptional enough to alter green belt, but that the circumstances themselves have to be exceptional, and (in addition) that the process needs to be part of the Local Plan review (which it hasn't been).

2. The proposal is also not consistent with Mr Boles formal guidance to local councils on protection of the Green Belt in a letter to Parliament on 6/3/14 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’. What are the ‘very special circumstances’ (not the flawed housing needs assessment) that justify the removal of green belt in Cumnor?

3. The proposal also makes nonsense on any count of the five purposes of the Green Belt, ie., 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.

4. Poor explanation and consultation, and changes of tack. NB:

- Site numbers 6 & 24 had already been withdrawn from the Plan but have now been reinstated. If they were deemed unsuitable for housing first time round, what has changed? Not explained.
- The last 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.
- The same applies to 4 & 5, deemed inappropriate as lying within the Cumnor Conservation Area, so that “*removing them from the Green Belt would serve no purpose*”. Not explained.
- Playing fields – what proposals are there for alternative provision if those in Cumnor and Botley are lost?
- Process of consultation – very poor. Consultees not warned that removal of green belt status WILL result in development; too short a period – 6 weeks not enough, and approaching Christmas; ludicrously difficult and technically flawed on-line consultation process, and major problems with the form even (as here) used as a Word document.

(continue on a separate sheet/expand box if necessary)

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17.12.14