



**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

Charles

Last Name

Cottriall

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

74, Norreys Road

Line 2

Cumnor

Line 3

Oxford

Line 4

Oxon

Post Code

OX2 9PU

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

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

X

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.

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Policy 4

The SHMA (Strategic Housing Market Assessment) is unsound and unsustainable. The SHMA figures are grossly inflated (being 2.5 times the Government's official projections) and based on unrealistic economic growth. The consultation process has been poor and rushed and has ignored independent expert advice. Case in point is that Cherwell District have found the figures for their area to be significantly overestimated. Furthermore much has been made of all the science jobs to be created by Harwell, but there is no guarantee that all these will be based at the Harwell site.

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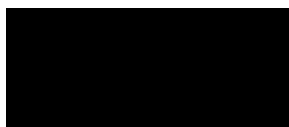
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Date:

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Paragraph

Policy

13

Proposals Map

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Yes

No

X

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Yes

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Policy 13

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, as the removal of green-belt will, in this area, inevitably lead to development, irrespective of what the Vale say now.

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

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?

Likewise Eric Pickles, communities secretary has also gone on record as warning against the destruction of Britain's green and pleasant land and that when planning for new buildings, protecting our precious green belt must be paramount

"We've always been a green and pleasant land: and we must stay that way, preserving the best of our countryside and other green spaces. But we've also been facing a serious housing shortage in this country, and we've got to increase supply in line with demand. I'm determined that we rise to that challenge without building unnecessarily on undeveloped land. The way to do that is to use brownfield better"

It would appear on the face of things that the VOWHDC has chosen to ignore the advice of central government and the very tenants on which Green Belt strategy is built.

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;
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 purpose. In particular, the special character of the village would be lost forever.

Furthermore in the original VOWH comments on the Green Belt review, they commented that 'Any proposed development would remain within the existing built area of the village' to prevent unnecessary sprawl and yet several of the sites are well outside of what would be described as the confinements of the existing village.

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.

The previous draft of the Local Plan Part 1 did not include the removal of Green Belt sites around Cumnor, other than for the one 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 South Cumnor strategic site (numbers 6 & 24) has already been withdrawn from the Plan because of its unsuitability for housing but has now re-inserted for green belt removal. If the sites are unsuitable, what is the point of removing their Green Belt status?

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 now?

Site 3 abuts the very busy A420 and would remove the clear break between the village and the road. There are also issues regarding access to the site e.g. from Chawley Lane and putting unacceptable pressure on the exit from Chawley lane onto the busy Cumnor Hill Road (B4044). Furthermore, the previous review talks about a strong tree line which would protect site 3. Yet the reality is somewhat different.

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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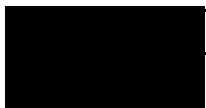
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18/12/2014

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Paragraph

Policy

44

Proposals Map

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Yes

No

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Yes

No

X

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Yes

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Policy 44

There has been little made of the environmental impact to the proposals. Loss of rural view from Wytham Woods (for which I believe there is a University Bye-Law), Urban sprawl along the A420 should site 3 be developed, impossible growth to the south and west of the village if sites 6 and 5 were to be developed, but to name a few.

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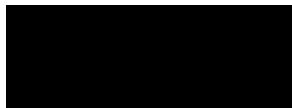
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Policy 7

There is a lack of appropriate infrastructure to support the Plan

1) The A34 is inadequate already and would need to be the main transport link from Cumnor to the great majority of newly-created jobs in the science area near Harwell.

2) Access to 4 out of the 5 sites would be via a single lane one-way route through the centre of the village which runs past the village school and is already deemed dangerous and inadequate at current traffic levels. Proximity of property on either side of this route and the village layout means widening/alternative routes are not viable.

3) Doctors facilities are already at capacity at the local Botley centre

4) The local primary school has only one class per year and is already at capacity and requires two sittings for lunch.

Furthermore the plan does not indicate how, with relatively small individual developments, it will provide the necessary infrastructure via the community infrastructure levy or any other means.

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Policy 3

Cumnor is described by the VOWHDC as a 'large village', yet it has relatively few amenities (premium Butcher / Newspaper shop / small village store cum post office) compared to say Eynsham and even Wootton. The current facilities will not support development of this scale (see other comments made with regard to GP and School) and will merely add to the traffic travelling to Botley / Wootton / Abingdon to reach appropriate facilities.

Many of the other statement already made in this response also apply here

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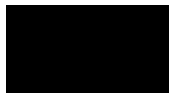
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Policy 6

Cumnor Hill has already been extensively developed with resulting strain on existing services already being felt. The existing planning policy already makes provision for a further 0.3 hectares of development on Cumnor Hill, which will only add to the existing problems seen on the west of Oxford. The proposed removal of many hectares of land from the Green Belt around Cumnor village, presumably with the intention of future development (or why remove it) will only add to these problems and ultimately make Cumnor a mere suburb of Oxford.

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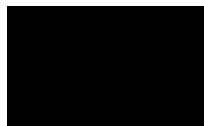
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Policy 1

The Local Plan 2031 states “the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence”.

The VOWHDC claim to have gathered a range of background evidence, but one major area of this which has been barely included is the lack of public consultation at all the various stages. For instance with previous stages of the consultation parish councils and residents were not informed of the VOWHDC intentions at the outset and even with the present consultation one can conclude that;

- 1) Inadequate time given for people to respond, approx. 6 weeks in total.
- 2) Bad timing, near Christmas when people are busy with other things.
- 3) Very difficult website to navigate which will put many respondents off.
- 4) Voluminous information, too much to wade through.
- 5) Language used is too complex and technical.
- 6) Consequences of Green Belt removal not clearly pointed out
i.e. development is the likely outcome.
- 7) Process seems undemocratic and for the reasons above almost underhand

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.

- 1) In line with Government policies drop all Green Belt Sites from the plan and concentrate, as Government documents insist, on brown field sites across the Vale (NPPF, 2012, especially Section 9, 'Councils Must Protect Our Green Belt Land', October 2014)
- 2) Scrutinise and retest the SHMA in line with the SHMA author's own caveats about housing need and projected numbers (paragraph 3.11). Heed the SHMA author's insistence that 'environmental constraints or issues related to congestion and local infrastructure' are 'very relevant issues in considering how much development can be sustainably accommodated and where new development should be located' (paragraph 4.11).
- 3) Concentrate on sites with existing adequate infrastructure and facilities and/or those that can be expanded quickly and sensitively to meet defensible housing need without harming the environment and minimising negative effects on existing communities.
- 4) Concentrate on areas where expansion would be beneficial including those where developing infrastructure (transport hubs such as new rail stations) would be welcomed and enhance existing and expanding communities. Core Policy 19: Reopening of Grove Railway Station is one example.
- 5) Take on board Government initiatives such as Garden Cities linked to existing and developing infrastructure. One example is Oxford Parkway linking by 2016 Oxford Rail Station with Bicester (designated Garden City) and stations to the North plus stations to London Marylebone.

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, 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:

18/12/2014