

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Cumnor Parish Council (Philip Hawtin)
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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. N/A

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.

These comments refer the Vale District Council's Core Policy 13: The Oxford Green Belt

General comments ? The Plan is inconsistent with planning guidance and government policies on the protection of Green Belts. ? Since the approval of the Oxford Green Belt in 1975, the Vale has been at the forefront of defending it against inappropriate development and protecting the unique character and landscape / rural setting of Oxford by preserving its openness. As a result, the Oxford Green Belt has stood the test of time and, in accordance with Government policy, the land has been kept permanently open and the countryside safeguarded from encroachment. This policy reflects deserved credit on the Vale Council. ? Paragraph 79 of the National Planning Policy Framework sets out Government policy on Green Belts:

"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

? The Government's position on Green Belt policy 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. ? The extensive guidance provided by the Government that supports this conclusion is set out by CPRE in its submission. ? In the Plan the Vale proposes to remove 22 sites from the Green Belt. The proposal is against Government's aims, and would be unnecessary if the SHMA housing figure had been tested properly and reduced in the light of social and environmental considerations. ? The Council ? and the Sustainability Assessment (SA) commissioned to underpin it ? both fail to take proper account of the footnote to paragraph 14 of the NPPF on which the Government Guidance is based. The SA asserts in paragraph 11.8. 6 that the housing target was adopted because it meets the ?objectively assessed housing need in full, in accordance with national policy? without acknowledging the potential restrictions to that policy cited above. It fails to consider whether the Council should have tested the SHMA number against those restrictions. The sustainability assessment therefore wrongly accepts the inroads into the Green Belt as sanctioned by the NPPF, when they quite clearly are not. ? The plan is therefore unsound and unsustainable and should be annulled. ? More seriously even in areas such as Cumnor, where the immediate threat of a development of houses has been withdrawn, the Vale still proposes to go ahead and remove the areas from the green belt. This would enable the Vale to sanction building in the current green belt as a two stage process: first remove the areas from the green belt then approve the developments

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.

The sites in the Oxford Green Belt that have been identified for housing should be withdrawn from the Plan. All reference to the green belt review and its conclusions should be removed from the plan.

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