

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mrs Fiona Newton
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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

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 removal of Green Belt status from the surrounding areas of Cumnor is not sound nor justified.

1. The NPPF states that "Green belts should only be altered in exceptional circumstances". This statement has been supported at the highest levels of Government, see Nick Boles statement 6/3/14 "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"

The removal of the Green Belt is not part of the Strategic Plan. The Cumnor sites (6 & 24) were removed from the Strategic Plan due to the sites' unsuitability for housing. Sites 4 & 5 are inappropriate as they lie within the Cumnor Conservation Area. As these sites have already been deemed to be inappropriate

and unsuitable for housing, it cannot be considered to be an 'exceptional circumstance' as there is no purpose to removing these sites from Green Belt status.

Furthermore, the review process needs to be 'through the preparation or review of the Local Plan.' This is not the case here, therefore it is a non-compliant process.

2. The removal of these sites from the Green Belt breaches the 5 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 sites are taken out of the Green Belt this would lead to speculative development 'possibly to meet the 1696 houses allocated to the Local Plan Part 2. By taking away the protection of the site abutting the A420, any development would lead to the merging of Cumnor Hill, Botley and Cumnor Village. The village would become a suburb of Oxford City losing its historic character. Two of the sites currently are home to the local thriving Cumnor Minors Football teams, and the Cumnor Cricket Club, as well as having fitness equipment and providing space for children to grow and play.

3. The Vale's own documentation says that development would only be appropriate 'within the existing built area of the village' (Page 63 of the revised Plan). The proposed areas clearly lie outside the current built area of the village. Therefore this plan is not sound.

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.

To make the Local Plan legally compliant, the sites around Cumnor must stay as 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.

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