



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	Mr	
First Name	Damen	
Last Name	Kerby	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	29 The Park	
Line 2	Cumnor	
Line 3	Oxford	
Line 4		
Post Code	OX2 9QS	
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation : Damen Kerby

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

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.

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.

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.

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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:

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Signature:

Date:

18/12/14

Part B – Please use a separate sheet for each representation

Name or Organisation : Damen Kerby

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

Paragraph

Policy

13

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

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

Yes

No

X

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 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.

(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”

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 purpose. 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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Date:

18/12/14

Part B – Please use a separate sheet for each representation

Name or Organisation : Damen Kerby

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

No

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 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

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