

## Comment

Consultee	Mr Sean Mannall (872079)
Email Address	[REDACTED]
Address	12 Pytenry Close Abingdon OX14 2RQ
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Sean Mannall
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Consultation Point	Core Policy 15: Spatial Strategy for South East Vale Sub-Area ( <a href="#">View</a> )
Status	Submitted
Submission Type	Email
Version	0.5
Files	<a href="#">Vale Local Plan Consultation November 2014 20141212.doc redacted.doc</a>
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.**

3. The Vale's uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty (AONB). The plan has identified four development sites in the Green Belt to accommodate 1,510 houses, and two in the AONB for a total of 1,400 houses, which is threatening to undermine the rural character of the Vale.

A further 11 sites are proposed for removal from the Green Belt. I am concerned that once land is removed from the Green Belt it will be at imminent risk of development, even if not immediately identified as a strategic site.

Green Belt The Plan is inconsistent with planning guidance and government policies on the protection of Green Belts. The National Planning Policy Framework (NPPF) makes it very clear that a Green Belt boundary may be altered only in "exceptional circumstances". Moreover, recent guidance (6 March 2014) states that: "Unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt." The Government's position on Green Belt policy, therefore, 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. North Wessex Downs AONB Under the Countryside and Rights of Way Act 2000 the Council has a statutory duty to have regard for the purposes for which the North Wessex Downs were designated an AONB, that is to conserve and enhance the natural beauty of the landscape. The NPPF places AONBs in the highest category of landscape protection and affords them "great weight" in the decision-making process. Further to this the NPPF confirms that AONBs are one location where restrictions apply to development and accordingly that: "Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest."

**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