|  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| South Black and White Logo | **South Oxfordshire Local Plan 2033**  Publication Version  Representation Form | | | | | | | | **Ref:**  **(For official use only)** | |  | |
|
|
|  | | | | | | | | | | |
| **Name of the Local Plan to which this representation relates:** | | | | | | | | South Oxfordshire Local Plan 2033 | | |
| **Please return by** **5pm on Thursday 30 November 2017 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk) | | | | | | | | | | |
| 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\* | |  |  |  |  |  | 2. Agent’s Details (if applicable) | | |  | |
| \*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. | | | | | | | | | | |  | |
| Title | | Mrs | | |  |  | | | | |
|  | | | | | |  | | | | |
| First Name | | Helen | | |  |  | | | | |
|  | | | | | |  | | | | |
| Last Name | | Marshall | | |  |  | | | | |
|  | | | | | |  | | | | |
| Job Title (where relevant) | | Director | | |  |  | | | | |
|  | | | | | |  | | | | |
| Organisation representing | | CPRE Oxfordshire | | |  |  | | | | |
| (where relevant) | | | | | |  | | | | |
| Address Line 1 | | 20 High Street | | |  |  | | | | |
|  | | | | | |  | | | | |
| Address Line 2 | |  | | |  |  | | | | |
|  | | | | | |  | | | | |
| Address Line 3 | |  | | |  |  | | | | |
|  | | | | | |  | | | | |
| Postal Town | | Watlington | | |  |  | | | | |
|  | | | | | |  | | | | |
| Post Code | | OX49 5PY | | |  |  | | | | |
|  | | | | | |  | | | | |
| Telephone Number | | 01491 612079 | | |  |  | | | | |
|  | | | | | |  | | | | |
| Email Address | | director@cpreoxon.org.uk | | |  |  | | | | |
| **Sharing your details**: please see page 3 | | | | | |  | | | | |

**Part B – Please use a separate sheet for each representation**

Name or organisation: CPRE

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

Paragraph Policy Policies Map

**Strat11: Green Belt**

4. Do you consider the Local Plan is: (*Please tick as appropriate)*

4. (1) Legally compliant NO

4. (2) Sound **NO**

4. (3) Complies with the Duty to Cooperate Yes

|  |
| --- |
| 5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments. |
| **Strat 11: Green Belt**  CPRE welcomes the first part of this Policy. We note that according to the NPPF only limited development should take place within the Green Belt unless very special exceptional circumstances exist. We also note the Kirkham 2015 Green Belt Assessment report which concluded that all major parcels of the South Oxfordshire Green Belt fulfilled one or more of the five functions of the Green Belt. We would also comment that in a recent survey, the vast majority of Oxfordshire residents support the preservation of Oxford’s Green Belt. (See [CPRE Oxon website](http://www.cpreoxon.org.uk/news/item/2447-cpre-survey-shows-majority-don-t-want-to-build-on-green-belt?highlight=WyJncmVlbiIsImdyZWVuJyIsIidncmVlbiIsImJlbHQiLCJiZWx0JyIsImJlbHQnLCIsImJlbHQnLiIsImJlbHQncyIsInN1cnZleSIsImdyZWVuIGJlbHQiLCJncmVlbiBiZWx0IHN1cnZleSIsImJlbHQgc3VydmV5Il0=))  We are amazed that following this evidence the second part of the Policy proposes removing large swaths of Green Belt land for development. There is no evidence of exceptional circumstances to justify this land grab. This policy is contradictory, and therefore unsound, and is clearly in contravention of the NPPF.  We also believe that in order to be found sound, the Policy should be expanded to include a specific description of how to determine applications.  (Continue on page 4 /expand box if necessary) |

|  |
| --- |
| 6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the Duty to Cooperate 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 second part of this policy as it currently stands should be deleted.  Determining applications - the following wording should be added to the Policy:  Applications for “inappropriate development” in the Green Belt, as defined by paragraph 89  (including the criteria setting out exceptions), is by definition, harmful to the Green Belt and will not  be approved except in very special circumstances.  Substantial weight will be given to resisting any harm to the Green Belt. ‘Very special circumstances’  will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any  other harm, is convincingly outweighed by other considerations, which are clearly in the wider public  interest.  Buildings considered not to be “inappropriate” are  **●** buildings for agriculture and forestry;  **●** provisions for outdoor sport, recreation and cemeteries that preserve the openness of the Green Belt and its purposes  **●** the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building – which, as under previous plans will be considered to be no more than 40% larger;  **●** the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces which, as under previous plans will be considered to be no more than 40% larger;  **●** limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or  **●** limited infilling or redevelopment of brownfield land, whether redundant or in continuing use (excluding temporary buildings), that would not have a greater impact on the openness and purpose of the Green Belt than the existing development.  In the case of enlarged or replacement residential and ancillary buildings or other forms of  development, the mere existence of permitted development rights to exceed thresholds of “inappropriate development” will not of itself be taken to constitute ‘Very Special Circumstances’ unless in the specific circumstances of the case   * the harm of the proposed development would be demonstrably and clearly less than that caused by permitted development option in respect of the need to preserve the openness of the Green Belt and its purpose; or * there are other considerations, which are clearly in the wider public interest, that would be delivered by the proposed development but not by the alternative permitted development option;   and in either case:   * these tests apply to each building proposed and will be judged on a case-by case basis.   Other forms of development that preserve the openness of the Green Belt and do not conflict with the purposes, as set out in paragraph 90 of NPPF, will not be considered intrinsically inappropriate, but applications will need to satisfy other policies in this Plan.  For the purpose of this policy, in line with NPPF paragraph 91 the construction elements of renewable energy projects will be considered to be ‘buildings’, and applicants will need to demonstrate that none of them will harm the openness of the Green Belt or conflict with its purposes; or if they do, that there are very special circumstances that may include, (but are not restricted to) the contribution made to renewable energy, and the absence of viable, less harmful alternative locations. |

**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?

**Yes**, I wish to participate at the

oral examination

✓

**No**, I do not wish to participate at the

oral examition

|  |
| --- |
| 8. If you wish to participate at the oral part of the examination, please outline why  you consider this to be necessary:  CPRE represents the views of its members across the District, is well-informed on the issues and would very much wish to contribute to any related discussion. |
| ***Please note*** *the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.* |

Signature: Date:

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by South Oxfordshire District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

✓

I would like to be kept informed about the progress of the Local Plan

✓

I would like to be added to the database to receive general planning updates

Please do not contact me again

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)

**Please return this form by** **5pm on Thursday 30 November 2017 to:** Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@southoxon.gov.uk](mailto:planning.policy@southoxon.gov.uk)