

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Professor Basil Crowley
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Response Date	16/12/14 20:30
Consultation Point	Core Policy 44: Landscape ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.2
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.**

*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.? Meeting housing need at the expense of damaging any AONB, particularly given that the extent of that need has not been adequately demonstrated, constitutes neither "exceptional need" nor "public interest".

**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.**

Pending a properly conducted review of the Green Belt, all land in the existing Green Belt (prior to any recent ad hoc "review") should be removed from the list of proposed development sites.

Any proposals to develop the North Wessex Downs AONB should likewise be removed from the Plan. It is submitted that the SHMA overstates the housing requirement, which means that there may be no need to reinstate these sites elsewhere.

***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