Comment

Consultee	Professor Clive Holes (870787)
Email Address	▆▆▆▆▆▆▆▆▆▆▆▆▆
Address	The Nook Church Lane Didcot OX11 0EZ
Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Professor Clive Holes
Comment ID	LPPub66
Response Date	08/12/14 21:13
Consultation Point	Core Policy 15: Spatial Strategy for South East Vale Sub-Area (View)
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.	East Harwell Campus (Harwell and Chilton Parishes)

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 Vale?s uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The plan has identified four 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.

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 proposed development will in my opinion destroy it.

The NPPF (paras 115 and 116) 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** .?

 There is no evidence to demonstrate "exceptional circumstances", or that the allocations in the AONB are in the public interest. They seem to me to be in the very opposite of the public interest.

 In the various landscape assessments of the AONB sites, there is no evidence of ?great weight? being applied to AONB characteristics when evaluating the selection of sites.

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.

1. Remove the Harwell Campus East site from the plan.

 2. Limit the housing allocation at the north end of the Campus to land within the existing campus, and remove the extension into greenfield land in East Hendred Parish.

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