

## Comment

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Comment by	Dr James Vincent
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**Q1 Do you consider the Local Plan is Legally Compliant?** Yes

**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

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

**Q3 Do you consider the Local Plan complies with the Duty to Co-operate?** Yes

**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.**

Core Policy 13 relates to protecting the Oxford Green Belt, which was designed to prevent urban sprawl around Oxford, and to preserve the rural setting and special character of the city of Oxford.

However, there is no Core Policy relating to the protection of the North Wessex Downs AONB, and in particular how the VWHDC have/have not complied with the NPPF paragraphs 115 which 116, and also the CROW Act 2000, Section 85 which places a legal obligation on the VWHDC to protect the North Wessex Downs AONB.

Indeed, the North Wessex Downs AONB has a greater level of protection against development than the Oxford Green Belt:

*?An AONB is in law equal to a National Park and a Local Authority (down to Parish Council level) are legally responsible for conserving and enhancing an AONB. There is no such legal protection for Green Belt. Green Belts are purely a form of local planning designation ? they do not indicate the particular quality of a landscape. As such, Green Belt boundaries can be adjusted by Local Authorities to accommodate development if deemed necessary. AONB boundaries cannot be adjusted by Local Authorities given their national designation and legally protected status. Therefore AONB status is higher than Green Belt, it is the reason that AONB Units exist, and they have Management Plans as another requirement of the CROW Act 2000?.* (SOURCE: North Wessex Downs AONB Management Board)

Further to this, at the Council Meeting on 15 th October 2014, where Councillors voted in favour of the Local Plan, The Head of Planning was asked the question ?Which has the greater level of protection, the Oxford Green Belt or the AONB??. They could not readily answer this question, and two further questions were submitted to the council and answered, before he wrongly confirmed that the Oxford Green Belt had greater levels of protection than the AONB. The senior councillors present at the meeting did not correct this statement . If the senior planning officials at the VWHDC do not readily know that the North Wessex Downs AONB has a greater level of legal protection than the Oxford Green Belt, then the decision to allocate an unprecedented number of houses to two greenfield sites within the AONB makes the plan unsound.

**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 Introduce a Core Policy specifically relating to the Protection of the North Wessex Downs AONB, beyond what is covered in Core Policy 44: Landscape
- 2 Remove the entire allocation of 850 homes from the Harwell East Campus.
- 3 Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- 4 Include provision of up to 400 new homes at the North West Harwell Campus (including the 125 already given outline permission), provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
- 5 Reallocate the 850 homes from the Harwell East Campus and the additional 150 houses from the North West Harwell Campus (1,000 houses in total) to other sites already identified by the Vale of White Horse, for example:
  - 1 (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
  - 2 (b) Didcot A (capacity for 425 houses), or
  - 3 (c) Land West of Steventon (capacity for 350 houses), or
  - 4 (d) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district.
- 1 Or reduce the total SHMA allocation for the District by 1000  
Remove the North Wessex Downs AONB entirely from the Science Vale ?Ringfence? in order to protect it from future speculative development should the Science Vale fall behind in delivery of its housing targets.

**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