

20 NOV 2017



**Vale  
of White Horse**  
District Council

**Local Plan 2031 Part 2**  
Publication Version  
Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse  
Local Plan 2031 Part 2

**Please return by 5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.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\***

\*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.

**2. Agent's Details (if applicable)**

Title

MR

First Name

MICHAEL

Last Name

WORWOOD

Job Title (where relevant)

Organisation representing  
(where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

**Sharing your details:** please see page 3

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

Name or organisation:

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

Paragraph

2.45/46

Policy

8a

Policies Map

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

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Complies with the Duty to Cooperate

Yes

☐

No

☐

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.

Please see page 4

(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.

Site should be excluded

(Continue on page 4 /expand box if necessary)



**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.**

**The Plan is Unsound because:**

**It is not consistent with 'Conservation area protection'**

Paragraph 129 of the NPPF states that:

*'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.'* Paragraph 132 states that: *Substantial harm to or loss of designated heritage assets of the highest significance, notably .... grade I and II\* listed buildings .... should be wholly exceptional.'*

*The site has been misnamed to get around classification of Fyfield as 'open countryside'*

Since the land in Fyfield first became a candidate for consideration, the DC and the developer have wrongly described it as 'East Kingston Bagpuize with Southmoor' and it is still misdescribed in LPP2 Policy 4a as being in the 'Settlement/Parish' of Kingston Bagpuize with Southmoor. It is not. It lies in the parish of Fyfield and Tubney and is part of Manor Farm based within Fyfield village.

The proposed development represents the irruption of an inappropriate *urban* (see LPP2 Appendix A page 18) **commuter dormitory** into valuable Fyfield farming land in open countryside near the Fyfield conservation area, drastically reducing the gap between settlements within a key landscape feature of the Vale.

*Fyfield's heritage, is as a result, threatened*

*The Development is disproportionate:* An urban commuter dormitory development of 600 or more close-packed modern houses is totally disproportionate in scale to the present village and completely at odds with and alien to its historic heritage, rural nature and environment.

**The Development is on Agricultural land**

The land earmarked for the proposal is shown as Category 2 (among the best and most versatile agricultural land) in the District Council's Sustainability Assessment for LPP2. To support national objectives of sustainability and food self-sufficiency, **NPPF paragraph 112** requires that the Council 'seek to use areas of poorer quality land in preference to that of a higher quality' when considering the proposal. There is no reference to this requirement in the Plan's analysis of the site.