



**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

Miss

First Name

Rachel

Last Name

Farrell

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

2.10 -  
2.116

Policy

15b (&15a)

Policies Map

Fig.2.6

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) Compiles 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.

When reading the Inspector's report on LLP1, it concluded that the two major housing development sites next to the Harwell Campus and within the AONB (850 new dwellings at 'East of Harwell Campus'; 550 new dwellings at 'North West of Harwell Campus) were unsound and it was recommended for deletion from the Local Plan. This has clearly not been considered within the LLP2.

The Inspector's report in LPP1 clearly states that the housing allocation of 1400 new dwellings within the AONB "would be a major development which the NPPF indicates should be refused in an AONB other than in exceptional circumstances and where it can be demonstrated it is in the public interest."

Also in the Inspector's notes: "In summary the need for development of sites 12 and 13 for housing has not been demonstrated and, having regard to the potential for mitigation, it would be likely to cause some harm to the landscape of the AONB and the recreational opportunities it offers." and in relation to the planning applications that would be put forward for alike developments "... I consider it unlikely that the exceptional circumstances necessary to approve such an application would reasonably be considered to exist. Consequently, the plan's housing allocations on sites 12 and 13 are not soundly-based."

**On this alone LLP2 this is not compliant with the Duty to cooperate and is not Sound.**

In March 2015 there were strong objections about the housing allocation for sites 12 and 13 adjacent to the Harwell Campus under Core Policy 4. Concerns and justifications for these objections were due to the density of the development, which has been judged to be the largest housing development ever proposed within any AONB. In CPRE's latest article called "Beauty Betrayed" they state that "The difficulty of planning major schemes without harming scenic beauty means that even brownfield sites ...cannot achieve the building densities that would make the most efficient use of our scarce land resources." Also - "However, while CPRE normally encourages the use of brownfield sites for housing, our calculations showed that these schemes [brownfield AONB development] had been planned

*at a density of just 16 dwellings per hectare (dph). When brownfield sites are built out at a national average of around 37 dph, this constitutes an incredibly inefficient use of land – particularly in nationally important landscapes.”*

With this amount of proposed housing and insufficient local amenities in schools, medical facilities, shops, and an already under pressure infrastructure, etc. the statement about an “attractive living Environment” (paragraph 2.107-108) is made out to be redundant.

I think that as a young person in this area where I have grown up, that the Vale of The White Horse should consider being an exemplar to the rest of the UK in working with the AONBs to retain their beauty by using more cost effective land outside of AONBs and aim to show that they are thinking of the local public interest and that of the country's? *"As a local authority, you must make sure that any proposals have regard for the purpose of conserving and enhancing the natural beauty of the AONB"* (<https://www.gov.uk/guidance/areas-of-outstanding-natural-beauty-aonbs-designation-and-management>)

I think that the points raised by the Inspector in his rejection of the proposed housing developments within the AONB at Harwell have not been addressed in the proposals set out in Local Plan Core Policy 15b and supplemented by Appendix A, Site 1 (pp 8-10).

I think that there is no justification that this amount of housing and its location within the Harwell Campus is important enough to meet the NPPF tests – Particularly those of exceptional circumstances and public interest – to be able to overcome the national planning policy requirement that such major developments should not be permitted within an AONB.

I strongly object to the introduction of the major new housing development at Harwell Campus within the AONB in Local Plan Part 2.

(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 inspector's report, the public's obvious concern, and mine for the location of this dense housing estate should not only be reconsidered, but should form the decision that this is a poor choice of site for any such development due to the sensitive nature and the lack of it being in:

- a) the public's interest
- b) the AONB/UK's interest

Not only this, but it would fail against the recommendations of the NPPF. This development would seriously compromise the character area of the AONB that does not lend itself to dense housing estates on an obviously small site.

Also considering the fact that there are currently on going works reducing the mature trees on the perimeter of the site it is also clear that this development would be even more visible due to the some of the existing character of the AONB being removed and the 'landscaped' edges that have been mentioned in the LLP2, is not maintained or retained.

2.107-2.108 “attractive living Environment” Should be removed as it will be untrue due to the density of housing being proposed, which would make it a less attractive area.

**2.116** *“It has been demonstrated that the proposed residential development at Harwell Campus would have limited impact on the landscape setting of the AONB and those limited impacts that have been identified are capable of being successfully mitigated.”*

This should be re-worded to (quoting from the inspector's report): *"The need for development of sites (12 and 13) for housing has not been demonstrated and, having regard to the potential for mitigation, it would be likely to cause some harm to the landscape of the AONB and the recreational opportunities it offers."* and *"There will be limited detrimental effects on the environment, the landscape and recreational opportunities"* should also reflect the Inspector's report.

I consider it necessary to modify the LPP2 with the removal of this site for housing.

(Continue on page 4 /expand box if necessary)

**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?

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

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

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

**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:

21/11/2017

### 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 Vale of White Horse 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@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

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