

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

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

Tracey

Last Name

Moggeridge

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.

I'd like to draw attention to the Inspector's report on LLP1 which has reached the decision that the two 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 recommended for deletion from the Local Plan. I'd like to raise my concerns about this and understand why this hasn't been factored within the LLP2?

To also draw further attention to the Inspector's report in LPP1 which clearly stated that the housing allocations: 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."*

Please also see

"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 addition, with relation to planning applications that would be put forward for similar 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."* These are the grounds on which LLP2 is not compliant with the duty to cooperate and absolutely is not Sound.

There were incredibly strong objections about housing allocation sites 12 and 13 back in March 15, next to the Harwell Campus under Core Policy 4. The concerns raised were focussed around the density of the population of the development –which has been considered to be the largest housing development ever proposed within any AONB. How can you realistically allow your names to be signed up against such a terrible accolade? Not something to be proud of. In CPRE's 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."

"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." According to a local resident's rough calculations (they are a landscape architect!) you are proposing approx 60 dwellings per hectare, which is absolutely ridiculous and a very poor standard of living in an area where the quality of living is why we are so strongly objecting to this dreadful development - it would be a severe compromise on quality of life, therefore making the statement "attractive living Environment" (paragraph 2.107-108) utterly redundant.

It is our proposition instead that the Vale of The White Horse be the exemplar to the rest of the UK in working with 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 do not feel that the issues raised by the Inspector in his rejection of the proposed housing developments within the AONB at Harwell, have been addressed in the proposals set out in LPCP 15b and Appendix A, Site 1 (pp 8-10). There is absolutely no valid justification that the amount of housing, not least its location within the Harwell Campus is important enough to meet the NPPF tests – in particular: of exceptional circumstances and public interest – to be able to overcome the national planning policy requirement that Major developments should not be permitted within an AONB.

I absolutely 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 and the public's clear and apparent concern for the location of this incredibly dense housing estate should not just be considered but should be the basis of the decision that this is the completely wrong choice of site for any development let alone housing due to the sensitive nature, the lack of it being in A. the public's interest and B. the AONB/UK's interest. Just as importantly it would fail against the recommendations of the NPPF.

This development would seriously compromise this area of AONB and would be the completely wrong location for a very dense and frankly poor development of crammed in houses. Please also take note that there are currently on-going works to cut down the trees on the perimeter of the site – the result of this is that not only are these trees (having been in situ for a great number of years) – being lost in this area, the development would be even more visible due to the some of the character of the AONB being removed and the 'landscaped' edges that have been mentioned in the LLP2 not retained.

2.107-2.108 “attractive living Environment” Should be removed as it is untrue due to the density of housing proposed, nor would the development be attractive, when you consider it would be replacing fields, trees – nature. That is an attractive living environment, not a myriad of roads, houses and hard-landscaping in complete juxtaposition to its surroundings.

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.”* Should be reworded to (directly 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.”* *“There will be limited detrimental effects on the environment, the landscape and recreational opportunities”* should also reflect the Inspector’s report.

The modification I consider necessary is for the removal of this site for housing in its entirety from the LPP2.

(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

☐ Y

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:

I'm very worried that our concerns (real, and valid) are not being heard fairly, objectively, and with the care, consideration and open-mindedness that they deserve. All too apparent to me is the lack of 'voice' that residents have, we don't have power or authority, but we do have passion and concern.

As a result I'm concerned that those in positions of power and authority are not challenged effectively, and should be made to listen to the very real issues of those of us who are residents in this area and have been for very many years. I do not believe a paper-trail is sufficient challenge and that an oral examination is a necessity in this process.

It is my duty as a citizen to protect this area for those generations to come, so that others may enjoy the beautiful spot on our planet in the same way that I have, and that we are not robbed of an area that cannot be replaced.

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:

21/11/17

Sharing your personal details

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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.**

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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

2.98

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

x

4. (2) Sound

Yes

☐

No

x

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.

We have been unable to find evidence to support the statement (5th bullet in LPP2 para 2.98) that “...a wide range of alternative development sites ... would lead to greater impact on the setting of the North Wessex Downs AONB.” This Statement appears to be unfounded and unsound and not legally compliant.

I 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.

This sentence needs to be removed from the LPP2 . “...a wide range of alternative development sites ... would lead to greater impact on the setting of the North Wessex Downs AONB.” In addition, evidence must be provided around how this site and the development of 1000 houses would not cause greater impact than that of a site somewhere else – such as outside an AONB. Furthermore, evidence should be provided around how it would ‘benefit’ an area of AONB and they should be made to explain this rather than have the assumption left unchallenged.

The modification I consider necessary is the removal of this site for housing entirely from the LPP2.

(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.

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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

☐

y

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:

As above, I feel this decision needs to be challenged fairly and effectively, and you need healthy and balanced discussions and not just objections on a form.

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:

21/11/17

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Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

x

I would like to be added to the database to receive general planning updates

x

Please do not contact me again

☐

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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

2.110

Policy

15b

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.

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"The development of a new neighbourhood at the Campus offers the opportunity to create a purpose built environment, tailored towards the housing needs of the Campus and the local science community." This statement takes no consideration whatsoever of the site in its current state and how the edge will be addressed. The proposed housing will have strong adverse impact on the character of the AONB and the surrounding area and this statement does not show the impact of the development on the surroundings character, but only looks internally within the boundaries of the site.

I 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)

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"The development of a new neighbourhood at the Campus offers the opportunity to create a purpose built environment, tailored towards the housing needs of the Campus and the local science community." This statement does not comply with the duty to cooperate due to the lack of context and the amount of disregard for the locals who live on the boundaries not only from the current resident's perspective and the walkers on the historic public right of way but from the regard of the AONB. I also do not believe that there are housing needs for the campus! The campus is within very easy transportation links of existing towns such as Didcot, Newbury and Abingdon. And what happened to the 'local' and existing community?

The modification I consider necessary is the removal of this site for housing entirely from the LPP2.

(Continue on page 4 /expand box if necessary)

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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

☐ y

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:

As above

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Signature:

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Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

☒ x

I would like to be added to the database to receive general planning updates

☒

Please do not contact me again

☐

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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 in
general

Policy

15b

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.

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I recognise the proposal in Policy 15b that the Council will continue "... to prepare a comprehensive development framework for the Campus and the 'Innovation Village'." (LPP2; Core Policy 15b, p. 56). However, I maintain the opinion that Policy 15b (and relevant elements of Policy 15a and the Development Template in Appendix A, 'Site 1' pp. 8-10) is not supported by sufficient and convincing evidence to validate the change of site allocation (from the previously allocated employment land) and to address issues raised by the Inspector in the examination of Part 1 of the LPP - which concluded the housing site allocation within the AONB to be unsound. I consider the proposed housing site within the AONB to be incredibly harmful to AONB objectives and that it would not be a sustainable development, in addition it would not meet the statutory provisions and national policy measures that are designed to safeguard the special qualities of the AONB. As the Inspector's report states (in your document !!) **"In reality, it would be all but impossible to determine if a potential occupier of this housing (Part 1 allocations) represents a Vale or Oxford housing need"** (paragraph 2.18). Therefore making this housing site both completely unnecessary, and entirely unsustainable.

As a result I utterly 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.

Mentions of "Sustainable development" or "sustainable community" such as in Paragraph 2.116 is unfounded and must be removed. As the Inspector's report states (in your document!) ***"In reality, it would be all but impossible to determine if a potential occupier of this housing (Part 1 allocations) represents a Vale or Oxford housing need"*** Therefore making this housing A. Unnecessary, and B. Unsustainable.

The modification I consider necessary is the removal of this site for housing entirely from the LPP2.

(Continue on page 4 /expand box if necessary)

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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

☐ y

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:

As above

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Name or organisation:

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

Paragraph

2.116

Policy

15b

Policies Map

Fig.2.6

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

4. (1) Legally compliant

Yes

☐

No

x

4. (2) Sound

Yes

☐

No

x

4. (3) Compiles with the Duty to Cooperate

Yes

☐

No

x

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.

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*To quote - "The land proposed for development at Harwell Campus is already allocated for development and is predominantly brownfield (previously developed) land (**Appendix C**)."* This statement is a falsity of the truth and the reality of the scope of the site. The site that was proposed for development in the LPP1 was a different site boundary and has been proposed for housing and was more in keeping with the area, even though it was very much opposed it would have been a better development in relation to the current situation of the site. The site now proposed not only includes a huge area of biodiverse land with roosting habitats for bats, deer, and hundreds of nesting bird species including birds of prey, but also includes very old and established trees that are in keeping with the surrounding area. Not only do these create a buffer for the RAF houses but also surround part of the Icknield Way, an ancient route, identified as the oldest road in Britain and therefore of considerable historical significance (<http://www.icknieldwaypath.co.uk/>). It is used daily as a public right of way. There is a vast amount of flora and fauna in the area. The two greens that are located to the North edge of the proposed site is not brownfield and serves the local community who live and retain the beautiful history of this area. The area with the larger Colonel's houses is not brownfield and if anything should be restored to their former glory to keep the history intact.

Consequently, I 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.

As such *"The land proposed for development at Harwell Campus is already allocated for development and is predominantly brownfield (previously developed) land (**Appendix C**)."* Should be removed from the LPP2. It should be replaced with "Although some brownfield, the site is predominately wooded or recreational. The Northern (estimated) 8ha of the site is not brownfield site but an area of local importance to the residents with the mature woodland and abundant flora and fauna. The current edge of the site makes a fabulous statement for all of those who wish to walk/run/cycle along the historic Icknield Way which is known as the oldest road in Britain and all of which would be a great loss to not only at a local scale but also at national scale." This is a part of this country that once removed, would be utterly irreplaceable, what an awful decision you would be taking if you did this.

The modification I consider necessary is the removal of this site for housing entirely from the LPP2.

(Continue on page 4 /expand box if necessary)

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7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

x

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

y

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:

As per the above, I don't have the words to express here my emotional and heart-felt dismay at these plans.

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:

21/11/17

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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

☐

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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

Glossary
Of LPP2

Policy

Policies Map

Local Plan 2031 Part 2
Detailed Policies and
Additional Sites-
Appendices

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.

Please refer to the Glossary of the “Local Plan 2031 Part 2 Detailed Policies and Additional Sites – Appendices” where you will see an AONB is described as “A national designation to conserve and enhance the natural beauty of the landscaping. The AONB in the Vale of White Horse District is the North Wessex Downs.” This is not an acceptable or satisfactory definition for such an important designation. Instead the CROW acts definition should be adopted.

As a result, I 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.

As per the above - “A national designation to conserve and enhance the natural beauty of the landscaping. The AONB in the Vale of White Horse District is the North Wessex Downs.” This is not a satisfactory or acceptable definition for such an area of such importance, instead the governmental definition should be used. **“An area of outstanding natural beauty (AONB) is land protected by the Countryside and Rights of Way Act 2000 (CROW Act). It protects the land to conserve and enhance its natural beauty.”** (<https://www.gov.uk/guidance/areas-of-outstanding-natural-beauty-aonbs-designation-and-management>)

The modification I consider to be the only suitable course of action is the removal of this site for housing entirely from the LPP2.

(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

☐ y

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:

As above

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:

21/11/17

Sharing your personal details

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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

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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

2.113

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.

Please refer to “2.113. The Council considers, for the reasons explained here, that ‘exceptional circumstances’ exist to justify development within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).” Please provide explanation for and examples of these exceptional circumstances – I am at a loss to understand what these are, when there are more appropriate sites that do not require the devastation of an area of outstanding natural beauty. These reasons are not clear in this whatsoever.

The council may ‘believe’ in the loosest sense that there are ‘exceptional reasons’, but they should also consider that “Under Section 85 of the Countryside and Rights of Way Act 2000, it is a legal duty for all relevant authorities to “have regard to” the purpose of conserving and enhancing the natural beauty of the area” (North Wessex Downs AONB Management Plan 2014-19)...exactly how is this proposed development ‘enhancing the natural beauty of this area? This point needs to be addressed.

If you are going to include the council’s opinion then you should consider too the council’s job to carry out the CROW responsibilities: “The CROW Act is designed to set out the roles and responsibilities that different organisations have to follow to manage AONBs” and (<https://www.gov.uk/guidance/areas-of-outstanding-natural-beauty-aonbs-designation-and-management>).

As a result, I object strongly 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.

Please remove this statement: "2.113. The Council considers, for the reasons explained here, that 'exceptional circumstances' exist to justify development within the North Wessex Downs Area of Outstanding Natural Beauty (AONB)." It is not founded and proof of this is inadequate at best. The opposition to this is a lot more rounded and reasoned, please refer to the inspector's report of LPP1. If keeping this section in, please amend to include *"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."* From the Inspector's report too.

The modification is the removal of this site for housing entirely from the LPP2.

(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.

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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

☐ y

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:

In order to express my dismay and concern at these proposals and to have a representation from the local community present.

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:

21/11/17

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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

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Please do not contact me again

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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

Referencing

Policy

Whole LPP2

Policies Map

N/A

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.

An overall comment: I object to the fact that the majority of references take you to the same page and not to the accurate location of the files. This is most unhelpful for anyone trying to understand the documentation. One example: The inspectors report that is quoted throughout has the reference of "Vale of White Horse Local Plan 2031: Part 1 - Inspector's Report (2016), Paragraph 25; available at: <http://www.whitehorsedc.gov.uk/services-andadvice/planning-and-building/planning-policy/new-local-plan-2031-part-1-strategic-sites>"

Is it not possible to find a document of this name on this page, therefore, making this misleading information.

As a result I 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)

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I request that your referencing is reviewed and proofed so that it links accurately to the information you are quoting hereby enabling this policy to actually be publically accessible and not in any way misleading.

The modification I consider necessary is the removal of this site for housing entirely from the LPP2.

(Continue on page 4 /expand box if necessary)

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☐

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

☐ y

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:

My concerns are such that if it's impossible for the Council to get it's referencing correct at the time of printing then what other mistakes, errors and omissions are prevalent in this planning application? This is simple stuff, I have genuine concerns around their quality control, their care and attention, and where else this might have a detrimental impact.

It makes the job of the general public that much harder in understanding and attributing information correctly.

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:

21/11/17

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