



**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

Mrs

First Name

Ellen

Last Name

Krier

Job Title (w here relevant)

Organisation representing  
(w here 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.

In the Inspector's report on LPP1 he concluded that the two vast housing development sites next to Harwell Campus and within the AONB were unsound and he recommended deleting them from the Local Plan. It is clear that this conclusion has not been considered within the LLP2.

The Inspector's report in LPP1 was clear that the housing allocations: a total 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." Furthermore 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."<sup>1</sup> **On this alone LLP2 this is not compliant with the Duty to cooperate and is not Sound.**

There were strong objections about housing allocation sites 12 and 13 in the March 2015 submission next to the Harwell Campus under Core Policy 4. The major concerns and justifications for these objections were due to the density of the development, which has been concluded to be the largest housing development ever proposed within any AONB this quote was about a scheme that was the largest before now: "600 houses...what would be among the largest single developments proposed for an AONB"<sup>2</sup>. In CPRE's latest article called "Beauty Betrayed" they state that "The difficulty of planning major schemes without

<sup>1</sup> Local Plan Part 1: Inspectors report. Vale of the White Horse.

<sup>2</sup> CPRE: Beauty Betrayed, how reckless housing development threatens England's AONB's

*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.” As well as “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.”<sup>3</sup> According to my rough calculations you are proposing roughly 60 dwellings per hectare, which is not only unprecedented and ludicrous but would also be a severe compromise on quality of life, therefore making the statement of an “attractive living Environment” (paragraph 2.107-108) redundant.*

**Should the Vale of The White Horse not think about being an 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"<sup>4</sup>**

**It is obvious that the issues 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 (supplemented by Appendix A, Site 1) (pp 8-10). There is no justification that the vast amount of housing and 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.**

The Countryside and Rights of Way act 2000 to which a planning authority with an AONB in their boundary must comply with states: “(4) A local planning authority whose area consists of or includes the whole or any part of an area of outstanding natural beauty has power, subject to subsections (5) and (6), **to take all such action** as appears to them expedient for the accomplishment of the purpose of **conserving and enhancing the natural beauty of the area of outstanding natural beauty** or so much of it as is included in their area.” Therefore it is your **legal duty** to ensure that all measures are taken to **Conserve and Enhance the AONB**.

**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.

The inspector's report and the public's clear concern for the location of this intensely dense housing estate should not only be considered but should form the decision that this is a poor choice of site for any development let alone housing due to the sensitive nature and the lack of it being in A. the public's interest and 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 a frankly ridiculously small site. Due to the fact that there are currently on going works

<sup>3</sup> CPRE: Beauty Betrayed, how reckless housing development threatens England's AONB's

<sup>4</sup> <https://www.gov.uk/guidance/areas-of-outstanding-natural-beauty-aonbs-designation-and-management>

cutting down the 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 character of the AONB being removed and the 'landscaped' edges that have been mentioned in the LLP2 not retained.

The Countryside and Rights of Way act 2000 to which a planning authority with an AONB in their boundary must comply with states: "(4) A local planning authority whose area consists of or includes the whole or any part of an area of outstanding natural beauty has power, subject to subsections (5) and (6), **to take all such action** as appears to them expedient for the accomplishment of the purpose of **conserving and enhancing the natural beauty of the area of outstanding natural beauty** or so much of it as is included in their area."<sup>5</sup> The granting of this **power** carries with it **duty** to ensure that all measures are taken to **Conserve** and **Enhance** the AONB. – This should be reflected in the LPP2 by undertaking a thorough analysis of alternate sites and showing the public that every measure has been taken by the council to put the AONB's interest as utmost importance by proving that there is absolute need for this housing site to be developed to the unprecedented extent and high density proposed.  
**How this will conserve and enhance the AONB?**

**2.107-2.108** "attractive living Environment" Should be removed as it is untrue due to the density of housing proposed.

**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." and "There will be limited detrimental effects on the environment, the landscape and recreational opportunities" should also reflect the Inspector's report. The conclusion of the inspector in saying that the housing should be deleted from the report should also be included within LPP2.<sup>6</sup>

**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

**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 believe the development proposed in 15b to be unfounded, unsustainable and against the moral responsibility of the council.

<sup>5</sup> Countryside and Rights of Way Act 2000. Part IV, Section 84. (4)

<sup>6</sup> Local Plan Part 1: Inspectors report. Vale of the White Horse.

**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:

20.11.2017

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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

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

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 cannot find evidence to support the statement (5th bullet in LPP2 paragraph 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 therefore could be deemed unsound and not legally compliant due to the lack of clear proof that alternate sites would have more of an impact.

**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 should not be included in the LPP2. “...a wide range of alternative development sites ... would lead to greater impact on the setting of the North Wessex Downs AONB.” and evidence should be provided as to 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.

**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

**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 believe the development proposed in 15b to be unfounded, unsustainable and against the moral responsibility of the council.

**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:

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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.

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.

“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 take into consideration the site in its current state and how the edge will be looked at. The proposed housing will have adverse effect to 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)

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.

2.110 “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 appear to 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 residents’ perspective and the walkers on the historic public right of way but from the regard of the AONB. The Inspector clearly states that: “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.”<sup>7</sup> Therefore 2.110 is not a sound statement and should be removed from the LPP2.

**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

**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 believe the development proposed in 15b to be unfounded, unsustainable and against the moral responsibility of the council.

**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:

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<sup>7</sup> Local Plan Part 1: Inspectors report. Vale of the White Horse.

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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.

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 acknowledge 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 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. As such I consider the proposed new housing site within the AONB to harmful to the AONB objectives and would **not** be a **sustainable development**, and would not meet the statutory provisions and national policy measures designed to safeguard the special qualities of the AONB. As the Inspector's report clearly states (in your document might I add) ***"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 A. Unnecessary, and B. Unsustainable.

**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.

Any mention of "Sustainable development" or "sustainable community" such as in Paragraph 2.116 is unfounded and should be removed. As the Inspector's report clearly states (in your document, might I add) ***"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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**No**, I do not wish to participate at the oral examination

x

**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 believe the development proposed in 15b to be unfounded, unsustainable and against the moral responsibility of the council.

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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

2.116

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

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 land proposed for development at Harwell Campus is already allocated for development and is predominantly brownfield (previously developed) land (Appendix C).”* This statement is bending the truth and the reality of the scope of the site. The site that was proposed for development in the LPP1 was not the same site boundary as has been proposed for housing and was also more in keeping with the area even if not ideal as it would have been more sparse and is related to the current situation of the site. The site now proposed not only includes a large area of biodiverse land with roosting habitats for bats and hundreds of nesting bird species, but also includes incredibly beautiful established trees that are in keeping of the surrounding area. Not only do these create a buffer for the old RAF houses but also surround a middle section of the Icknield Way, which is an ancient route, identified as the oldest road in Britain and therefore of considerable historical significance<sup>8</sup>. This is a frequently used public right of way. There is a vast amount of flora and fauna in the area. The green that is located at the Northern edge of the proposed site is also not brownfield and serves the community (social and recreationally) who live and retain the beautiful history of the old RAF houses with pride. The area with all the stunning Colonel’s houses is also not brownfield and if anything should be restored to their former glory to keep the beautiful 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

<sup>8</sup> <http://www.icknieldwaypath.co.uk/>

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) 8-10ha 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 beautiful statement for all of those who wish to walk the historic Icknield Way which is known as the oldest road in Britain and all of which would be a humongous loss to not only at a local scale but also at national scale.

**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

x

**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 believe the development proposed in 15b to be unfounded, unsustainable and against the moral responsibility of the council.

**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:

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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.

In the glossary of the appendices called “Local Plan 2031 Part 2 Detailed Policies and Additional Sites – Appendices” 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 a satisfactory enough definition for the most important environmental designation possible in the UK. The CROW act 2000 definition should be adopted.

**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.

“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 enough definition for such an important designation and 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.”**<sup>9</sup>

<sup>9</sup><https://www.gov.uk/guidance/areas-of-outstanding-natural-beauty-aonbs-designation-and-management>

**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

**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 believe the development proposed in 15b to be unfounded, unsustainable and against the moral responsibility of the council.

**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:

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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	Policy	Policies Map
2.113	15b (&15a)	Fig.2.6

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

4. (1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4. (2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4. (3) Compiles with the Duty to Cooperate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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.

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).”* Could the “reasons explained here” please be clarified as there do not appear to be any.

The council may consider that there are ‘exceptional reasons’, but should they also not 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”<sup>10</sup>?*

If you are going to include the council’s opinion in the report then perhaps you should consider too the council’s job to carry out the CROW responsibilities: *“The CROW Act sets out the roles and responsibilities that different organisations must follow to manage AONBs”* where the councils role is *“to **take all such action** as appears to them expedient for the accomplishment of the purpose of **conserving and enhancing the natural beauty of the area of outstanding natural beauty**”<sup>11</sup>.*

**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)

<sup>10</sup> North Wessex Downs AONB Management Plan 2014-19

<sup>11</sup> Countryside and Rights of Way Act 2000. Part IV, Section 84. (4)

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 consider removing this statement from the LPP2: 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 does not appear to be founded and does not provide enough proof. The opposition to this is a lot more founded, including in 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.”*<sup>12</sup> from the Inspector’s report too.

Please also show how the council is fulfilling its duty by helping to **enhance** and **conserve**<sup>13</sup> the AONB through this proposed scheme.

**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

**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 believe the development proposed in 15b to be unfounded, unsustainable and against the moral responsibility of the council.

<sup>12</sup> Local Plan Part 1: Inspectors report. Vale of the White Horse.

<sup>13</sup> Countryside and Rights of Way Act 2000. Part IV, Section 84. (4)

**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:

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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	Policy	Policies Map
Referencing	Whole LPP2	N/A

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

4. (1) Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4. (2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4. (3) Compiles with the Duty to Cooperate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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.

General comment: I would like to object to the fact that the majority of references take you to the same page and not to the accurate location of the files, which is misleading and does not make it easy to follow or easily accessible to the public.

For 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>”

It is not possible to find a document of this name on this page, therefore, I find this is misleading information.

**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 would ask that your referencing is revised to accurately link to the piece of information that it quotes so that this policy document is publically accessible and not misleading.

Generally the whole set up on how to object to this has caused people to not be vocal about their objections due to the lack of clarity on the system and not making documents accessible. I personally think it is pretty appalling that (having spoken to a variety of people) even a trained

professional struggles to follow your website/system and planning objections as this does not allow for a varied and fair public consultation.

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

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**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:

**Due to the public nature of planning I believe reference and information should be made accessible to all member of the public.**

**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.

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