

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dr Stephen King
Comment ID	LPPub60
Response Date	07/12/14 21:54
Consultation Point	5.108 Paragraph ( <a href="#">View</a> )
Status	Submitted
Submission Type	Web
Version	0.1
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	East Harwell Campus (Harwell and Chilton Parishes)
If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)	
Q3 Do you consider the Local Plan complies with the Duty to Co-operate?	Yes

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

Paragraph 5.108 states *?The conservation and enhancement of the North Wessex Downs AONB together with its Management Plan will be supported (as required by the Countryside and Rights of Way (CROW) Act 2000)?.*

By proposing 1400 new homes in the vicinity of the Harwell Oxford Campus, within the North Wessex Downs AONB, the Vale of White Horse District Council is materially failing in its legal duty to *conserve and enhance the natural beauty of the area of outstanding natural beauty?* (source: Countryside and Rights of Way (CROW) Act 2000, Section 85), and compromising the ability of the relevant Parish Councils to meet their obligations. This is despite the VW HDC being a partner to the AONB's statutory Management Plan 2009-2014.

The South East Regional Assembly is also statutorily obliged to take into account the objectives and purposes of AONBs in its policy formulation and decision planning in drawing up the draft South East Plan.

The proposed housing allocation in the vicinity of the Harwell Oxford Campus is without precedent in any National Park or AONB within the UK (source: North Wessex Downs AONB Board), yet 77% of the District lies outside the AONB.

At the 15 th October 2014 meeting of VW HDC, councillors present stated that preserving the Oxford Green Belt was due greater consideration than the North Wessex Downs AONB, a view not contradicted by the Head of Planning (source: eyewitness testimony). This is, of course, in contradiction to the Law which affords an AONB the same legal protection as a National Park. A Green Belt has no such protection; it is merely a planning designation.

On this point the Local Plan is legally unsound.

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

To make the Local Plan sound, legally compliant, and protect the North Wessex Downs AONB it is necessary to significantly scale back large-scale housing developments within the AONB, reallocating new homes to other sites outside the AONB boundary.

This could be achieved by reallocating all housing proposed in the vicinity of the Harwell Oxford Campus (1000 homes) except that wholly contained within the perimeter of the Campus (400 homes) to other sites in the Vale of White Horse outside of the AONB (of which sites for 2490 homes have already been identified), or by reducing the SHMA for the Vale of White Horse district by 1000 homes.

The North Wessex Downs AONB should also be entirely removed from the Science Vale Ringfence? in order to protect it from future speculative development.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?** No - I do not wish to participate at the oral examination