



# Vale of White Horse Local Plan Part One: Strategic Sites and Policies Publication Stage Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

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

Title	Mr	
First Name	Keith	
Last Name	Mintern	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	71 Crafts End	
Line 2	Chilton	
Line 3	Didcot	
Line 4	Oxon	
Post Code	OX11 0SB	
Telephone Number		
E-mail Address (where relevant)		

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	<div>5.42</div>	Policy	<div>Core Policy 13: The Oxford Green Belt</div>	Proposals Map	<div></div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div>X</div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>X</div>
4 (3) Complies with the Duty to co-operate	Yes	<div>X</div>	No	<div></div>

Please mark as appropriate.

5. 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.

Core Policy 13 relates to protecting the Oxford Green Belt, which was designed to prevent urban sprawl around Oxford, and to preserve the rural setting and special character of the city of Oxford.

However, there is no Core Policy relating to the protection of the North Wessex Downs AONB, and in particular how the VWHDC have/have not complied with the NPPF paragraphs 115 which 116, and also the CROW Act 2000, Section 85 which places a legal obligation on the VWHDC to protect the North Wessex Downs AONB.

Indeed, the North Wessex Downs AONB has a greater level of protection against development than the Oxford Green Belt:

*“An AONB is in law equal to a National Park and a Local Authority (down to Parish Council level) are legally responsible for conserving and enhancing an AONB. There is no such legal protection for Green Belt. Green Belts are purely a form of local planning designation – they do not indicate the particular quality of a landscape. As such, Green Belt boundaries can be adjusted by Local Authorities to accommodate development if deemed necessary. AONB boundaries cannot be adjusted by Local Authorities given their national designation and legally protected status. Therefore AONB status is higher than Green Belt, it is the reason that AONB Units exist, and they have Management Plans as another requirement of the CRoW Act 2000”.* (SOURCE: North Wessex Downs AONB Management Board)

Further to this, at the Council Meeting on 15<sup>th</sup> October 2014, where Councillors voted in favour of the Local Plan, The Head of Planning was asked the question “Which has the greater level of protection, the Oxford Green Belt or the AONB?”. They could not readily answer this question, and two further questions were submitted to the council and answered, before he wrongly confirmed that the Oxford Green Belt had greater levels of protection than the AONB. The senior councillors present at the meeting did not correct this statement. If the senior planning officials at the VWHDC do not readily know that the North Wessex Downs AONB has a greater level of legal protection than the Oxford Green Belt, then the decision to allocate an unprecedented number of houses to two greenfield sites within the AONB makes the plan unsound.

(continue on a separate sheet/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 test you have identified at 5 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.

In order to make the Local Plan sound and legally compliant with NPPF 115, 116 and the CROW Act 2000, the following modifications are necessary:

- Introduce a Core Policy specifically relating to the Protection of the North Wessex Downs AONB, beyond what is covered in Core Policy 44: Landscape
- Remove the entire allocation of 850 homes from the Harwell East Campus.
- Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus (including the 125 already given outline permission), provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
- Reallocate the 850 homes from the Harwell East Campus and the additional 150 houses from the North West Harwell Campus (1,000 houses in total) to other sites already identified by the Vale of White Horse, for example:
  - (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
  - (b) Didcot A (capacity for 425 houses), or
  - (c) Land West of Steventon (capacity for 350 houses), or
  - (d) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district.
- Or reduce the total SHMA allocation for the District by 1000
- Remove the North Wessex Downs AONB entirely from the Science Vale “Ringfence” in order to protect it from future speculative development should the Science Vale fall behind in delivery of its housing targets.

***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?

X

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

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**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 adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Signature:

Date:

11/12/14