



**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 Part
1

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 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

MARTIN

Last Name

SMALL

Job Title

PRINCIPAL ADVISER, HISTORIC
ENVIRONMENT PLANNING

(where relevant)

Organisation

ENGLISH HERITAGE

(where relevant)

Address Line 1

EASTGATE COURT

Line 2

195-205, HIGH STREET

Line 3

GUILDFORD

Line 4

SURREY

Post Code

GU1 3EH

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

1.31

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

The Council has also worked with English Heritage on the historic environment policy and potential site allocations, which should merit a mention in paragraph 1.31.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

2.10

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

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Although not an issue of soundness, the section on promoting tourism on page 25 could helpfully refer to the historic character of the Vale and the heritage assets therein being an important attraction for tourists.

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.

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Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

2.14

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes the reference to the conservation areas in the district in paragraph 2.14 and the recognition of the importance of development protecting and maintaining the special characteristics of the built and natural environment, but we would prefer “.....protecting, maintaining and enhancing the special characteristics of the built, historic and natural environment of the Vale.....” as not all historic features are “built” or “natural”.

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.

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Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

After
2.15

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-
operate

Yes



No

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.

English Heritage welcomes the section on “Conserving our historic environment” on page 27.

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.

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Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

3.1

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes the references in the Spatial Vision to new development respecting local character, protecting the Vale's outstanding and distinctive natural and built environment and conserving and enhancing its important heritage.

However, the Vale's important heritage should be conserved and enhanced through other measures, not simply through new development, and this should be an objective in its own right as part of a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment as required in local plans by the NPPF and in line with the tenth core planning principle in the Framework to "conserve heritage assets in a manner appropriate to their significance.....". We would also prefer "protecting...natural, historic and built environment..." as not all historic features are "built".

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.

The third paragraph of the Vision should be amended to read:

The important historic heritage of the Vale will have been, and will continue to be, conserved and enhanced. New development will have respected the local character of the Vale, protecting its outstanding and distinctive natural, historic and built environment. High design.....climate change.

This would accord with paragraphs 17 and 126 of the NPPF.

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



Yes, I wish to participate at the oral examination

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Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Strategic
Objectives

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-
operate

Yes

☒

No

☐

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.

English Heritage welcomes the reference to the built and natural heritage in Strategic Objective SO3, although we would prefer “built, historic and natural” as not all historic features are “built” or “natural”.

We also welcome the reference to the historic and cultural assets of the Vale in SO11, which effectively repeats SO3.

However, we would welcome a specific objective “Conserve and enhance the historic environment including designated and non-designated heritage assets”, to mirror SO10 for the natural environment and as part of a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment as required in local plans by the NPPF. This would also be in line with the tenth core planning principle in the Framework to “conserve heritage assets in a manner appropriate to their significance.....”

In itself and in isolation, English Heritage does not consider that these omissions are sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).

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.

SO3 should be amended to read “built, natural and historic.....”.

A new specific objective should be added: “Conserve and enhance the historic environment including designated and non-designated heritage assets”.

These amendments would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.

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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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: ☐

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Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Figure 4.1

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes the reference to safeguarding village character (which should include historic character) in the third key strand of the Spatial Strategy but we are disappointed not to see this reflected in the text in the column under this heading.

In itself and in isolation, English Heritage does not consider that this omission is sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).

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.

The text under the third key strand of the Spatial Strategy should include a reference to protecting village character. This amendment would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.

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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Yes, I wish to participate at the oral examination

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Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage would welcome the addition to the second paragraph under “Development at Market Towns, Local Service Centres and Larger Villages” of a requirement for development outside the existing built up area of the settlements to be in accordance with the policies of the Plan taken as a whole (as is required for the strategic allocations) or specifically “...future parts of the Local Plan 2031 and would not adversely affect heritage assets”.

In itself and in isolation, English Heritage does not consider that this omission is sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).

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.

A requirement for development outside the existing built up area of the settlements to be in accordance with the policies of the Plan taken as a whole should be added to the second paragraph under "Development at Market Towns, Local Service Centres and Larger Villages".

This amendment would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.

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



Yes, I wish to participate at the oral examination

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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:

[Redacted Signature]

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

4.33

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes the recognition of the historically constrained nature of the Vale's market towns in paragraph 4.33, but the historic character should also be seen as a benefit in attracting shoppers.

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.

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☒

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

☐

Yes, I wish to participate at the oral examination

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Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

5.2

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes the recognition of the historic town centre of Abingdon-on-Thames as a benefit in paragraph 5.2.

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.

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Signature:

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12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph	Abingdon-on-Thames and Oxford Fringe Sub-Area	Policy		Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

English Heritage welcomes the references to the historic town centre of Abingdon-on-Thames and the distinctive character of the countryside and villages having been maintained in the vision for the Abingdon-on-Thames and Oxford Fringe Sub-Area, although we would prefer “conserved and enhanced” as terminology more consistent with the NPPF.

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.

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Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

8

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage would prefer the first paragraph of Core Policy 8 to read “.....whilst protecting the Oxford Green Belt and historic and biodiversity features”.

In itself and in isolation, English Heritage does not consider that this omission is sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).

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.

The first paragraph of Core Policy 6 should be amended to read “.....whilst protecting the Oxford Green Belt and historic and biodiversity features”.

This amendment would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.

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

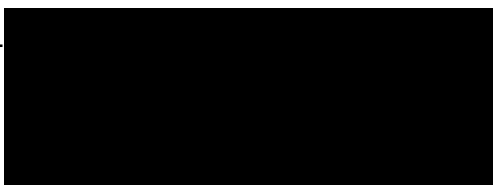
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Yes, I wish to participate at the oral examination

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes key site issue iv regarding the long distance views of the site from (to ?) Oxford, although the view is of spires, towers and domes.

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.

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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: ☐

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

10

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage would welcome a requirement in Core Policy 10 for proposals for development within the Abbey Shopping Centre and the Charter Area to conserve and enhance the historic town centre, although we recognise that this is considered in the Supplementary Planning Document.

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.

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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: ☐

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

5.31

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

It is our understanding that Elms Parade is a much-loved and much-used local heritage asset. This should be reflected in paragraph 5.31.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

11

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☐

No

☒

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

It is our understanding that Elms Parade is a 1930's shopping parade that defines the character of the area and is a much-loved and much-used local heritage asset. It is in our view, it is inadequate simply to require a new development to be of at least equal architectural merit – this will not retain the Parade's historic or communal significance. It appears to us to be contradictory for the Plan to encourage the redevelopment of the Abbey Shopping Centre and the Charter to improve the retail offer and vitality of Abingdon town centre and yet also propose the loss of an existing active shopping area in Botley. The NPPF recognises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance.

In addition, Policy 11 fails to include any requirement for any redevelopment to avoid any adverse impact on views to and from Oxford. We would also welcome criterion iv being more positive i.e. requiring proposals to enhance the character and appearance of the area in accordance with the requirement of paragraph 157 of the NPPF for local plans to contain a clear strategy for enhancing the historic environment.

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.

Criterion iv should be reworded as “it can be demonstrated that the proposals would result in an enhancement to the character and appearance of the local area.....and would not unacceptably affect views to and from Oxford” This would accord with the requirement of paragraph 157 of the NPPF.

Criterion vi and other references to the redevelopment of Elm Parade should be deleted and the boundary of the defined Botley Central Area revised to exclude Elm Parade in accordance with paragraph 126 of the NPPF and the tenth core planning principle.

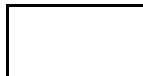
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7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?



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

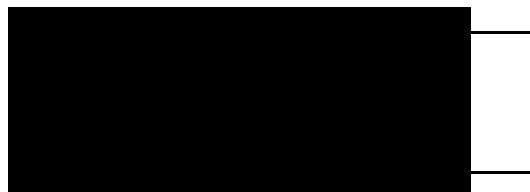


Yes, I wish to participate at the oral examination

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

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

12

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage has serious concerns over the proposed South Abingdon-on-Thames Bypass because the proposed route runs right through the Sutton Wick settlement site Scheduled Monument. However, as Core Policy 12 merely safeguards the land for the bypass rather than itself proposing the bypass, we raise no objection to this Policy.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

13

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes and supports Core Policy 13.

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.

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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: ☐

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

14

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☐

No

☒

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

The proposed site of the Upper Thames Reservoir is of considerable potential archaeological interest when considered at a landscape scale. Paragraph 126 of the NPPF requires local planning authorities to set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment and, in doing so, to recognise that heritage assets are an irreplaceable resource. Paragraph 128 of the NPPF requires local planning authorities, in determining applications, to require an applicant to describe the significance of any heritage assets affected, in a level of detail proportionate to the asset's importance.

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.

Core Policy 14 should therefore include an additional criterion requiring any proposal for a reservoir to minimise the effect on the archaeological significance of the site, which should include the retention of in situ of archaeological remains where possible and their full investigation and recording, with the results deposited in a public archive. This would be consistent with the requirements of paragraphs 126 and 128 of the NPPF.

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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: ☐

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

South East
Vale Sub-
Area

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

4 (3) Complies with the Duty to co-
operate

Yes

☒

No

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.

English Heritage welcomes the statement in the vision for the South East Vale Sub-Area that the town centre in Wantage will have been protected and enhanced, although we would prefer “conserved and enhanced” as terminology more consistent with the NPPF. We also welcome the statement that “The countryside and villages will have retained their distinctive character”.

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.

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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?

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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: ☐

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

18

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

The proposed Harwell Link Road is likely to adversely affect the setting of the grade II listed hotel, which still retains something of a rural setting despite the proximity of the A34. The level of harm will to a great extent be determined by the way in which the road is designed and how heavily engineered it is. A light touch road at grade with minimal signage and other traffic paraphernalia is needed to ensure that the scheme would not be unacceptably damaging.

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.

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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?

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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: ☐

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Western
Vale Sub-
Area

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-
operate

Yes

☒

No

☐

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.

English Heritage welcomes the reference to the historic character and landscape setting having been maintained in the vision for the Western Vale Sub-Are on page 84, although we would prefer “conserved and enhanced” as part of the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment as required by the NPPF.

We also welcome the statement that “The countryside and villages will have maintained their distinctive character”.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Overview
page 90

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes the reference to protecting the Vale's high quality natural and built environment in the Overview on page 90, but we would prefer "conserving and enhancing" to "protecting" as terminology more consistent with the NPPF and "high quality natural, historic and built environment" as not all historic features are "built".

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.

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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: ☐

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

25

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes criterion vii of Core Policy 25, although it should be “Registered Historic Parks and Gardens” and the list of designated assets should include Scheduled Monuments rather than “etc”. Ideally, the criterion should also refer to non-designated heritage assets as part of the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment as required by the NPPF.

In itself and in isolation, English Heritage does not consider that these omissions and error are sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).

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.

Criterion vii of Core Policy 25 should be amended to read “Registered Historic Parks and Gardens” and “and Scheduled Monuments” instead of “etc”, and should refer to non-designated assets. These amendments would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.

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

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

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



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



Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes criterion v. of Core Policy 27 for the reference to the AONB and heritage assets and their setting, as part of the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by the NPPF.

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.

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

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

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

☐

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

31

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes the reference to museums and heritage centres in clause ii. of Core Policy 31. We also welcome the reference to the re-use of a historic building as one of the exceptional circumstances in which larger developments will only be supported, although we would prefer “sensitively re-use”. We would also prefer to see the addition of “and which would not adversely affect heritage assets or their setting” after “scale and character of the locality” in the final paragraph of the Policy.

In itself and in isolation, English Heritage does not consider that these omissions are sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).

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.

The final paragraph of Core Policy 31 should be amended to read “.....in keeping with the scale and character of the locality and which would not adversely affect heritage assets or their setting” and “.....for example, to sensitively re-use a historic building.....”.

These amendments would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.

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

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

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



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

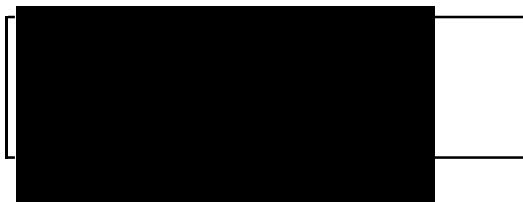


Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

33

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes the reference to making towns and villages more attractive in clause vi of Core Policy 33, but we would prefer clause v to say “amenities, character and special qualities of the surrounding area” and we suggest that the Policy could include a reference to traffic calming/management and public realm enhancement schemes that enhance pedestrian movement.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

35

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes Core Policy 35, but we suggest that the Policy could include a reference to traffic calming/management and public realm enhancement schemes that enhance cycling and walking.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.85

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes the recognition in paragraph 6.85 that design quality and the historic environment are linked, but in addition to the historic environment often including characteristics associated with high standards of design quality, good design quality conserves and enhances the historic environment.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.86

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes the Council's preparation of a comprehensive design guide (we have commented separately on the Draft Design Guide).

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.

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

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

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

☐

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

37

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes Core Policy 37 in principle, particularly the reference to history in clause i but we would prefer the Policy to be strengthened e.g. "All proposals for new development must be of high quality design", and the addition of "conserves and enhances historic character in clause i between "cultural diversity and history" and "and reinforces local identity" as part of the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by the NPPF.

In itself and in isolation, English Heritage does not consider that these omissions are sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).

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.

The opening sentence of Core Policy 37 should be amended to read "All proposals for new development must be of high quality design that:"

Clause i should be amended to read ".....cultural diversity and history, conserves and enhances historic character and reinforces local identity.

These amendments would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.

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

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

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



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



Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Redacted Signature]

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes Core Policy 38, particularly “integrate with the surrounding built, historic and natural environments” in the fourth bullet point. However, we would welcome the addition of a new bullet point “conserve and enhance the historic environment, including the retention and incorporation into the scheme of buildings and other features of historic interest”, as part of the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by the NPPF.

In itself and in isolation, English Heritage does not consider that this omission is sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).

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.

A new bullet point; “conserve and enhance the historic environment, including the retention and incorporation into the scheme of buildings and other features of historic interest”, should be added to Core Policy 38.

This amendment would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.

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

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

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



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

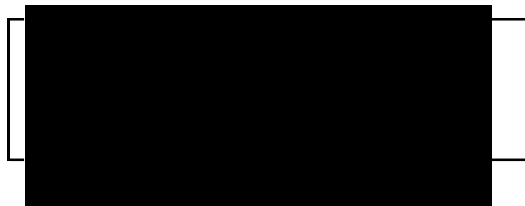


Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.90

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes paragraph 6.90, particularly the reference to the Oxfordshire Historic Landscape Characterisation, which forms an important part of the up-to-date historic environment evidence base required by paragraph 169 of the However, we would like to also see a reference in this paragraph to non-designated heritage assets, which are important features of local neighbourhoods and communities, providing a sense of place, community identity and local history.

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.

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

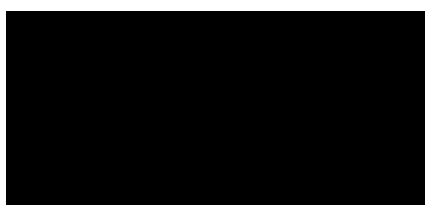
☐

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: ☐

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:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.91

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

An attractive historic environment is also one of the reasons that people want to visit and work in the district's towns and villages.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.92

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes the reference to heritage at risk in paragraph 6.93, although the 2014 Register is now available. The positive strategy for the conservation and enjoyment of the historic environment required in Local Plans by paragraph 126 of the NPPF should include “heritage assets most at risk through neglect, decay or other threats”. We note that Core Policy 39 set outs in more detail the Council’s approach to tackling heritage assets at risk, which we consider satisfies this requirement, but it would be helpful if more was said about the Council’s approach in this paragraph.

The Plan should also include more detail on which assets are currently at risk (as part of the up-to-date historic environment evidence base as required by paragraph 169 of the NPPF) and a recognition that the English Heritage Register only identifies higher grade assets at risk (i.e. not grade II listed buildings or grade II Registered Historic Parks and Gardens) and that other assets may become at risk during the life of the Plan.

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.

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

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

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

☒

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

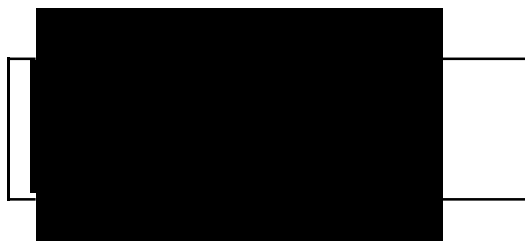
☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.93

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes paragraph 6.93.

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.

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

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

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

☐

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.94

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes paragraph 6.94 for the Council's commitment to continuing to produce Conservation Area Character Appraisals and Management Plans and producing a list of non-designated heritage assets, and particularly the stated intention to do so with the help of the local community. However, it would be helpful to indicate that there are five existing Character Appraisals and how they have been used to inform the policies and proposals of the Plan as part of the up-to-date historic environment evidence base required by the NPPF, although with less than 10% of the Vale's conservation areas with a Character Appraisal, this is far from a comprehensive element of the evidence base (as recognised in the Council's Topic Paper 8).

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.

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

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

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

☐

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.95

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes paragraph 6.95 for its reference to the Historic Environment Record, which forms an important part of the up-to-date evidence on the historic environment as required by paragraph 169 of the NPPF.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

English Heritage welcomes paragraphs 6.96-6.98 as part of the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment as required by the NPPF.

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.

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

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

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

☐

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

39

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☐

No

☒

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes and supports Core Policy 39 as a strategic policy for the conservation and enhancement of the historic environment, as required by paragraph 156 of the NPPF, and as part of the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment as required by paragraphs 126 and 157 of the NPPF (but see comments below on the evidence base).

We note that a number of historic environment policies are still saved from the Local Plan 2011, and consider that these provide the complementary development management policy or policies we feel are necessary as clear policies on what will or will not be permitted and where and to provide as clear indication of how a decision maker should react to a development proposal as required by paragraphs 15 and 154 of the NPPF respectively.

We will, of course, expect these to be replaced in due course by a new development management policy or policies in the future Local Plan Part 2, which should include guidance on development affecting Conservation Areas and on development affecting non-designated assets, both of which appear to be currently lacking.

The NPPF sets out a number of requirements for local plans in respect of the historic environment:

- set out a positive strategy for the conservation and enjoyment of the historic environment [126];
- include strategic policies to deliver the conservation and enhancement of the historic environment [156];
- contain a clear strategy for enhancing the natural, built and historic environment [157];
- identify land where development would be inappropriate, e.g. for its environmental or historic significance [157];
- be based on adequate, up-to-date and relevant evidence about the historic environment [158, 169 and 170].

English Heritage's Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans, (Consultation Draft published July 2014 - <http://www.english-heritage.org.uk/content/imported-docs/f-j/gpa1-he-local-plans-consultation.pdf>) provides advice meeting these requirements.

As regards the adequate, up-to-date and relevant evidence base to underpin the strategy and policies of the Local Plan which, although the last of the requirements above, is the starting point, the Good Practice Advice Note advises that it is important to bear in mind that this is not simply an exercise in setting out known sites but, rather, in understanding their value to society (i.e. their significance) of sites both known and potential.

The Note also advises that it may be helpful to collate the information about the historic environment in a Heritage Topic Paper. We therefore welcome the Council's Topic Paper 8 "The built environment and historic environment". We note the conclusion in paragraph 4.2 of this Paper that "The Vale is lacking a robust evidence base for the conservation and enhancement of the historic environment", a concern we raised when commenting on the draft Local Plan last year.

The Council's response to this conclusion is to include a policy within the Local Plan setting out how the Council will improve its understanding of the historic environment through producing an evidence base. It could be argued that a policy seeking to ensure an adequate evidence base rather defeats the object as the Local Plan should be based on an adequate, up-to-date and relevant evidence base. This is particularly important as the Local Plan Part 1 allocates 21 strategic development sites.

However, we have noted and welcomed the references in the Plan to the Oxfordshire Historic Landscape Characterisation and Historic Environment Record, which are both important components of the evidence base, and suggested that a reference be included in paragraph 6.94 explaining how existing Conservation Area Character Appraisals have formed part of that evidence base.

We also suggest a reference to the Oxford View Cones Study in Core Policy 44 (or its supporting text), which also forms part of the evidence base as noted in the Council's Topic Paper 8. There is also a reference in the Plan to English Heritage's Heritage at Risk Register.

Ideally, the strategic development allocations and other policies and proposals in the Local Plan would have been informed by character assessments of the historic towns in the Vale. However, we have assisted the Council in using the Oxfordshire Historic Landscape Characterisation in assessing potential strategic allocations, which we consider satisfies paragraph 170 of the NPPF.

With the other references to the evidence base, both existing and suggested, English Heritage is satisfied that the Local Plan Part 1 is underpinned by an adequate, up-to-date and relevant historic environment evidence base and therefore satisfies paragraphs 158 and 169 of the NPPF.

However, we do not consider that the evidence base is adequate for the more detailed policies and smaller site allocations to be included in the proposed Local Plan Part 2. English Heritage will therefore be expecting the Council to make progress in producing Conservation Area Character Appraisals and Management Plans as in line with the commitment in Core Policy 39. In addition we would encourage the Council to commission or undertake character assessments of the historic towns in the Vale and to consider the preparation of a heritage strategy for the district as a whole. We would be pleased to advise the Council on the preparation of such a strategy.

We have explained above that we are satisfied that Core Policy 39 satisfies the NPPF's requirement for a strategic policy for the conservation and enhancement of the historic environment of the Vale. However, following our comment above, we would welcome a commitment in the Policy to the preparation of character assessments of the historic towns in the Vale and a heritage strategy for the district.

In developing the "positive strategy for the conservation and enjoyment of the historic environment" required by paragraph 126 of the NPPF, the NPPF advises that local planning authorities should take into account:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place.*

In addition, English Heritage believes that it is clear from the Government's use of the words and phrases "*seeking positive improvements*", "*positive strategy*", "*deliver the conservation and enhancement*" and "*a clear strategy for enhancing*" in the NPPF that the Government is expecting local planning authorities, through their Local Plans, to actively deliver the conservation and enhancement of the historic environment"; it is not sufficient for local planning authorities to be passive or merely reactive in the conservation and enhancement of their historic environment.

It is English Heritage's view that a "positive" strategy for the conservation and enjoyment of, and a "clear" strategy for the enhancement of, the historic environment, comprises more than a strategic policy and (in this case) saved historic environment development management policies. Our Good Practice Advice Note 1 explains our view that "a strategy to conserve heritage assets potentially engages all aspects of planning". We therefore look for recognition of the importance of the historic environment to the character, economy and quality of life of the Borough through references throughout a Local Plan.

There are a number of references to the historic environment throughout the Plan that we have welcomed. In our view, however, these do not quite fully comprise or demonstrate a positive or clear strategy. It is for this reason that we consider the Pre-Submission Local Plan to be unsound as it stands. We have suggested additional references (particularly in respect of paragraph 3.1 and Core Policies 11 and 14) which, if added to the Plan, would, in our view, result in the Plan containing the positive and clear strategy required by the NPPF. We would then consider the Plan to be sound in this respect.

We suggest that the Council consider whether it would be appropriate to identify land where development would be inappropriate for its historic significance (in accordance with paragraph 157 of the NPPF) when preparing the Local Plan Part 2.

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.

The Local Plan should be modified to include the additional references and amendments that we have identified elsewhere in our comments to ensure that the Plan has a “positive” strategy for the conservation and enjoyment of, and a “clear” strategy for the enhancement of, the historic environment, as required by paragraphs 126 and 157 of the NPPF.

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

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

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

☐

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

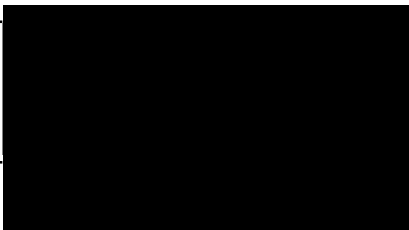
☒

Yes, I wish to participate at the oral examination

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

At this time English Heritage wishes to reserve its position, but we may wish to appear (depending on the Council’s response to our comments) in order to assist the Inspector with understanding our position.

Signature:



Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

40

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes Core Policy 40, particularly the references to historic assets and heritage assets. However, for clarity, we would suggest the penultimate sentence of the Policy should read “where historic assets would be adversely affected”.

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.

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

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

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



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



Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes and supports Core Policy 41 for clauses i and iii.

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.

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

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

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

☐

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.114

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage welcomes the reference in paragraph 6.114 to the Oxford Views Study, which was produced in collaboration with ourselves. We consider that it would be helpful to note that three of the identified views in the Study are from viewpoints within the Vale (Raleigh Park/Harcourt Hill, Boars Hill and Hinksey Hill A34 Interchange).

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage welcomes Core Policy 44, particularly clauses iv, v and viii. However, we would welcome specific reference to protecting the green setting of Oxford and views from the three viewpoints in the Vale identified in the Oxford Views Study (Raleigh Park/Harcourt Hill, Boars Hill and Hinksey Hill A34 Interchange), although we recognise that this might be more appropriate for a more detailed landscape/views policy in the Local Plan Part 2.

In itself and in isolation, English Heritage does not consider that this omission is sufficient to render the Local Plan unsound, but when taken in combination with a number of other omissions and amendments we have identified. we consider that the Plan does not quite set out the positive strategy for the conservation and enjoyment of, and clear strategy for enhancing, the historic environment required by paragraphs 126 and 157 of the NPPF (see our comments on Policy 39).

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.

Specific reference to protecting the green setting of Oxford and views from the three viewpoints in the Vale identified in the Oxford Views Study (Raleigh Park, Harcourt Hill, Boars Hill and Hinksey Hill A34 Interchange) should be added to Core Policy 44, unless the Council intends to make these specific references in the Local Plan Part 2.

These amendments would help ensure that the Plan sets out the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by paragraphs 126 and 157 of the NPPF.

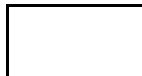
Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original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

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

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



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

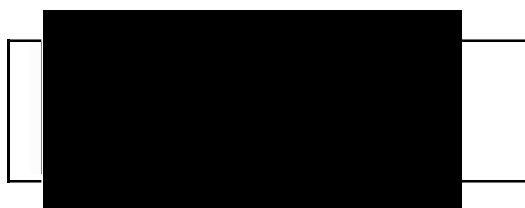


Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

6.124

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes



No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes



No

4 (3) Complies with the Duty to co-operate

Yes



No

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.

English Heritage suggests that paragraph 6.124 should also refer to historic significance (of the Wilts and Berks Canal) in the second bullet point.

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.

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

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

12.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph	Appendix A: Site Development Templates	Policy		Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

English Heritage welcomes the General Requirements relating to the Historic environment and cultural heritage on page 5 of the Appendices, although we would prefer the third Requirement to be reworded as “Heritage assets should be conserved and, where possible, enhanced”.

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.

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

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

☒

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

North West
of Radley

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-
operate

Yes

☒

No

☐

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principles to “preserve the setting of Radley College, including views to and from the College as well as the parkland setting of the College” and “Conserve and enhance the semi-rural setting of the historic core of Radley”. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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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: ☐

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Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph	<div>East of Kingston Bagpuize</div>	Policy	<div></div>	Proposals Map	<div></div>
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4. Do you consider the Local Plan is :

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

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principles to “Sensitively design development to minimise any impact on the setting of the Conservation Area to the south-west of the site” and “Respect the setting of Appleby Cottage.....”. The eastern boundary of the site is on the line of the Aelfrith Ditch which, although not scheduled, may still be of national significance, in which case paragraph 139 of the National Planning Policy Framework would apply. (Your archaeological advisor can advise further on this point). We would like to see an additional principle, perhaps in a new section on “historic environment and cultural heritage”, requiring development to retain and respect the line of this earthwork. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Land South
of East
Hanney

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-
operate

Yes

☒

No

☐

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principles to “minimise impacts on the nearby Conservation Area” and “Retain the historic field pattern within the site.....”. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

East of
Sutton
Courtenay

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principle to “sensitively design development to minimise any impact on the setting of the Sutton Courtenay Conservation Area.....”. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

West of
Harwell

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-
operate

Yes

☒

No

☐

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principle to “Retain the historic field pattern within the site.....”. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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

Yes, I wish to participate at the oral examination

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Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

East of
Harwell
Campus

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-
operate

Yes

☒

No

☐

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principle to “Retain the historic field pattern within the site.....”. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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

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

☐

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

East of
Harwell
Campus

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principle to “Retain the historic field pattern within the site.....”. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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

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

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

☐

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

☐

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but the identified site would complete the envelopment of Wantage Charlton Conservation Area, which has its roots as a rural hamlet, in modern housing. The area still retains the character of a village centre when viewed from within. An additional requirement should therefore be added to the Site Development Template that the scale and extent of development around the historic centre should be limited. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

An additional requirement should be added to the Site Development Template:

“Sensitively design development to minimise any impact on the setting of the Wantage Charlton Conservation Area.”

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

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

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



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



Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

Monks
Farm,
Grove

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☐

No

☒

4 (3) Complies with the Duty to co-operate

Yes

☒

No

☐

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the requirement for a Heritage Statement to be submitted to show how the listed buildings at Monks Farm and Grove Wick Farm have been sensitively considered. Monks Farm is a good rural group with a farmhouse, barn and cottages, and surrounding this group with housing and a link road can only, in our view, seriously harm the setting of these buildings. It is critical therefore that, if this allocation is taken forward, the impact on setting is mitigated as much as possible through limiting the scale of the surrounding development and sensitive design.

The route way (Cow Lane) which runs through the allocated site, is at least post-medieval in date, appearing on Rocque's map of Berkshire in 1761. This historic feature should be retained and respected within any development scheme. An additional requirement should be added to the Site Development Template requiring the retention of and respect for this historic route. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

An additional requirement should be added to the Site Development Template:

“Retain and respect the historic route way Cow Lane within the 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.

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



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



Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

South West
of
Faringdon

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-
operate

Yes

☒

No

☐

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principle to “Retain the historic field pattern within the site.....”. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph	Land south of Park Road, Faringdon	Policy		Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principle of an archaeological investigation. However, we would like this principle to go further and require the investigation to inform the scheme, with any significant remains being retained in situ wherever possible. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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Signature:

Date:

17.12.14

Part B – Please use a separate sheet for each representation

Name or Organisation : ENGLISH HERITAGE

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

Paragraph

North of
Shrivenham

Policy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

☒

No

☐

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

☒

No

☐

4 (3) Complies with the Duty to co-
operate

Yes

☒

No

☐

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.

English Heritage makes no comment on the merits or otherwise of this site allocation but we welcome the principles “The layout of any development scheme must take account of important views in this area”, “Development should be sensitively designed to conserve and enhance the setting of the Shrivenham Conservation Area”, “Retain part of the south of the site (the area closest to Shrivenham Conservation Area) to preserve the existing character of the conservation area” and “Views across the site to the listed church (St Andrews) should be accommodated in the site layout”. This comment is without prejudice to any comments we may wish to make on any future planning application for the development of this site.

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.

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