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Planning Policy Team
Vale of White Horse District Council
Abbey House
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17 December 2014

Dear Sir,

RE: Vale of White Horse Local Plan 2031 Part One, Strategic Sites and Policies, November 2014

Thank you for the opportunity to comment on the Vale of White Horse Local Plan 2031 (Part 1). After consultation with our planning advisors and in addition to the representations we made earlier this year in response to the Local Plan 2031 Housing Delivery Update (February 2014) we would like to make the following points.

Oxford Preservation Trust has just completed the Oxford Views Study in partnership with Oxford City Council, funded by English Heritage which aims to provide a robust methodology for understanding the character and assessing the significance of Oxford protected views. In addition the study has established the kinetic nature of the views, the importance of views out and across the city and their important relationship to the setting of many of Oxford's heritage assets of exceptional significance. We are concerned that the draft VOWH Local Plan 2031 has omitted any specific reference to Oxford and the importance of its views and landscape setting which was previously included as saved Policy NE8 of the VOWH Local Plan 2011.

Policy NE8 - *The landscape setting of Oxford* states:

The Conservation of Oxford's landscape setting will take priority in considering proposals for development in areas within view of the city. Development will not be permitted if it would:

- 1) Harm the landscape setting of Oxford*
- 2) Obscure or detract from an important view of the skyline of collegiate Oxford, particularly within the view cones as defined on the proposals map.*

Chairman Professor Roger Ainsworth MA, DPhil, FRAeS
Director Deborah Dance, OBE, MSc, FRICS

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This is replaced by proposed Policy 44 which refers to protecting and enhancing key features that contribute to the nature and quality of the Vale of White Horse District's landscape including the important landscape settings of settlements and very important views and visually sensitive skylines, but with no specific mention of Oxford.

We note that high priority will continue to be given to conservation and enhancement of the natural beauty of the North Wessex Downs AONB and planning decisions will have regard to its setting. We would like the same consideration to be given to Oxford's important skyline and setting and to see this is set out in the Plan with a specific reference to the city.

Oxford Preservation Trust objects to the Council's approach to development in the Oxford Green Belt. It remains our view that any review of the city's Green Belt would need to be carried out in a considered and comprehensive manner and involve all the adjoining authorities in accordance with the 'Duty to Cooperate'. There is no current agreement to review Oxford's Green Belt in this manner and as such OPT considers it inappropriate and without justification to bring forward individual sites on an ad hoc basis within the Green Belt.

An emphasis on managing growth whilst protecting the Green Belt is repeated throughout the new Local Plan 2031. Paragraph 5.41 states that the local Green Belt Review undertaken does not preclude, and would inform a future Green Belt Review, should this be needed, to contribute to meeting any identified unmet housing need within the Oxfordshire Housing Market Area. This is not an acceptable approach as no Green Belt sites should be developed in this piecemeal fashion, prior to a countywide review. As such we do not accept the legitimacy of the approach taken by the Vale to use Kirkham Landscape Planning Limited to produce a local Green Belt Review. The conclusions of the review that propose alterations to the Green Belt boundaries at the edge of the settlements should not be accepted as it is 'cherry picking' sites in the Green Belt.

Oxford Preservation Trust raises additional concerns on the future development of Botley. We support the categorisation of Botley as a Local Service Centre which given its location on the fringes/within the suburbs of the city of Oxford works with the wider designations for the Vale of White.

Core Policy 11 of the Local Plan 2031 Part One, Strategic Sites and Policies specifically concerns the Botley Central Area. OPT strongly objects to the wording of this policy and proposes that; paragraph (iv) should state that proposals should enhance the character and appearance of the local area; paragraph (v) should include reference to working

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with the community and key stakeholders to achieve a Masterplan for the area and paragraph (vi) should seek to retain Elms Parade.

In regard to the draft Local Plan more generally, OPT have identified a number of issues with Core Policies 37, 38, 39 as set out below. Where appropriate, amendments to the wording of the policies are suggested.

A more robust emphasis on the need for high quality design is required from Core Policy 37. The policy should also include a requirement for community engagement on major applications, to allow understanding of significant impacts on the local area to be examined and understood. Core Policy 38 should also give higher profile to engaging communities in the design process.

Paragraph (i) of Core Policy 39 should replace 'where possible' with 'always' in order to firmly ensure that development proposals protect and enhance heritage assets and their setting, so according with national policy. Furthermore, paragraph (vi) should not only seek to maintain a list of non-designated heritage assets but it should also seek protection to these assets.

We trust that these views will be taken into consideration when the Local Plan is the subject of an Examination in Public next year.

Yours faithfully,

Debbie Dance
Director

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