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| **New%20Image1** | **Local Plan 2031 Part 2**  Publication Version  Representation Form | | | | | | | | **Ref:**  **(For official use only)** |  |
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| **Name of the Local Plan to which this representation relates:** | | | | | | | | Vale of White Horse Local Plan 2031 Part 2 | |
| **Please return by** **5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) | | | | | | | | | |
| This form has two parts:  **Part A** – Personal Details  **Part B** – Your representation(s). Please fill in a separate sheet for each representation you wish to make. | | | | | | | | | |
| **Part A** | | | | | | | | | |
| 1. Personal Details\* | |  |  |  |  |  | 2. Agent’s Details (if applicable) | | |
| \*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. | | | | | | | | | |
| Title | | Mrs | | |  | |  | | |
|  | | | | | | |  | | |
| First Name | | Helen | | |  | |  | | |
|  | | | | | | |  | | |
| Last Name | | Marshall | | |  | |  | | |
|  | | | | | | |  | | |
| Job Title (where relevant) | | Director | | |  | |  | | |
|  | | | | | | |  | | |
| Organisation representing | | CPRE Oxfordshire | | |  | |  | | |
| (where relevant) | | | | | | |  | | |
| Address Line 1 | | First Floor | | |  | |  | | |
|  | | | | | | |  | | |
| Address Line 2 | | 20 High Street | | |  | |  | | |
|  | | | | | | |  | | |
| Address Line 3 | |  | | |  | |  | | |
|  | | | | | | |  | | |
| Postal Town | | Watlington | | |  | |  | | |
|  | | | | | | |  | | |
| Post Code | | OX49 5PY | | |  | |  | | |
|  | | | | | | |  | | |
| Telephone Number | | 01491 612079 | | |  | |  | | |
|  | | | | | | |  | | |
| Email Address | | director@cpreoxon.org.uk | | |  | |  | | |
| **Sharing your details**: please see page 3 | | | | | | |  | | |

**Part B – Please use a separate sheet for each representation**

Name or organisation:

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

Paragraph Policy Policies Map

Chapter 3 – Development Policy 36 (Heritage Assets)

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

4. (1) Legally compliant Yes No

4. (2) Sound **No**

4. (3) Compiles with the Duty to Cooperate Yes No

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| 5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.  If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments. |
| **Development Policy 36: Heritage Assets**  NPPF paras 126-7 encourage conservation of non-designated as well as designated heritage assets, but while policies 36 and 39 of the Vale Local Plan Part 2 on archaeology refer to non-designated assets, there is no **policy** to designate or conserve locally listed buildings, parks and gardens and other heritage assets. This not only fails to meet fully the expectations of national policy in terms of positive and effective planning for the historic environment, but also fails to reflect the Council’s own existing practice – and references made in the text (eg para 3.321 to a list of local parks and gardens).  Several heritage assets have been locally listed helping to ensure their retention and/or their settings are better safeguarded as a result of the Council’s proactive approach that engages with the public who help to nominate locally important heritage for inclusion. NPPF puts the principles of heritage conservation on a continuous sliding scale in which heritage value is balanced against development need. Policy on such local designations must therefore follow the same principles and sequential tests as for designated assets, in which it is clear that the balance shifts, but includes locally important as well as national assets.  While the reference to ‘routeways’ in policy is welcome, it would be much better made here where their contribution to wider historic character is better represented and can be extended to historic waterways (eg Thames Wilts and Berks Canal) and surviving historic railway infrastructure (noting the international historic significance of Brunel’s Great Western Railway).  (Continue on page 4 /expand box if necessary) |

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| 6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. |
| We propose the deletion of the whole of para 3.325, since it is identical to 3.324.  Before Para 3.304 **i**nsert:  [3.303a] In addition to nationally designated heritage assets the Council has already instituted a local heritage list, which it will continue to develop with input from the public. Over the course of the plan period the Council will also explore the desirability of developing a Heritage Plan to ensure practical delivery of the benefits to be derived from the historic environment, following Historic England’s guidance and learning from the experience of other authorities.  We propose replacement of Policy 36 with the following amended version (changes underlined) which includes some grammatical changes to clarify meaning. These modest additions address these matters and would bring the policy more into line with national policy and statutory obligations.  **Development Policy 36: Heritage Assets**  *The Council will continue to maintain and develop a list of heritage assets of local importance to which the same heritage management principles will be applied as those for designated assets below (Policies 37-9), taking account of their relative importance and the sequential tests set out in national planning policy.*  *Proposals for new development that may affect heritage assets (designated and non-designated) must demonstrate that they conserve and enhance the special interest or significance of the heritage asset and its setting in accordance with* ***Core Policy 39*** *(Local Plan 2031: Part 1), and particularly where they:*  *i. make a positive contribution to local character and distinctiveness (especially if identified as such by county and local landscape and historic landscape characterisations); and / or*  *ii. make a positive contribution towards wider social and economic benefits; and / or*  *iii. provide a viable future use for a heritage asset that is consistent with the conservation of its significance; and / or*  *iv. protect a heritage asset that is currently at risk, safeguarding or restoring its historic interest in a sustainable, non-damaging use.*  *This policy includes historic routeways, waterways and railway infrastructure.*  *Within 5 years of the adoption of this Part 2 Plan the Council will explore the desirability of developing a formal SPD Heritage Plan in line with Historic England guidance to ensure that the positive benefits that the historic environment brings to resident communities and visitors are delivered.*  (Continue on page 4 /expand box if necessary) |

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

**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?

**Yes**, I wish to participate at the

oral examination

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| 8. If you wish to participate at the oral part of the examination, please outline why  you consider this to be necessary:  We believe that CPRE has a useful understanding of these issues and could  contribute meaningfully to this discussion.  These suggested amendments raise issues concerning scope and relation to NPPF policies and the interaction of designated and non-designated assets that may warrant further explanation. |
| ***Please note*** *the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.* |

Signature: Date:

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

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