

1 April 2019

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working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

RE: Schedule of Proposed Draft Main Modifications, Vale of White Horse Local Plan Part 2 - CPRE Oxfordshire response, April 2019

1. Shippon should remain washed over by the Green Belt (MM4 &5, Core Policy 8b - Dalton Barracks)

It is not entirely clear from the Inspector's letter of 27 November 2018 whether the intention is to seek removal of Shippon from the Green Belt.

CPRE Oxfordshire supports the position of St Helen Without Parish Council in seeking the continued 'washing over' of Shippon village by the Green Belt as this is in line with the wishes of local residents as expressed in the Neighbourhood Plan, and indeed of Oxfordshire residents more generally who have indicated their support for the Green Belt remaining permanent and open.¹

CPRE Oxfordshire does not believe that the exceptional circumstances exist to justify this alteration to Green Belt boundaries. Evidence already submitted shows clearly that the 1,200 houses proposed at Dalton Barracks could be easily accommodated within the existing developed area of the site, and there is no requirement at all for Green Belt release.

However, even if the Inspector is minded to proceed with this site, the additional removal of Shippon from the Green Belt is not justified. The stated objective of the policy(2.62) is to 'respect the historic character of Shippon and its rural approach'. This would clearly be best achieved by retaining Shippon within the Green Belt.

2. Removal of site allocation at Harwell Campus is supported (MM8, Core Policy 15a)

CPRE Oxfordshire supports the removal of this site from the Plan, which is entirely appropriate in terms of giving great weight to the conservation and enhancement of the North Wessex Downs Area of Outstanding Natural Beauty.

¹ Oxford Green Belt Public Opinion Survey, Alpha Research, 2015 – see [CPRE Oxon website](http://www.cpreoxon.org.uk).

3. Grove allocation needs clearer justification (MM10, Core Policy 15a)

We share the concerns of the Wantage & Grove Campaign Group that the North Grove Link Road has previously been committed to as part of the Grove Airfield development within the Vale of White Horse Local Plan 2011. The identification of the need for an additional site to support this road therefore needs clearer justification.

4. Site East of Kingston Bagpuize with Southmoor- Fyfield & Tubney Parish (MM28, Appendix A Site development templates - relating to Policies 4a and 8a)

CPRE Oxfordshire supports the concerns raised by Fyfield & Tubney Parish Council and FLAG (Fyfield Local Action Group).

We consider that there are outstanding issues around the level of increased traffic through Marcham village that have not been addressed and would have a negative impact on the Marcham Air Quality Management Area.

We believe the Additional Air Quality Evidence published by the Vale of White Horse District Council to be flawed as it is based on an unrealistically low estimate of the traffic that will be generated.

In light of the above, we believe that, as a minimum, the wording of the proposed modification should be amended as follows:

- The occupation of dwellings on the site will not begin prior to the completion of the upgrade to Frilford Junction ~~unless an alternative phasing plan is agreed with the County Council.~~

5. Landscape and Heritage Policies

a) Heritage Policies

CPRE Oxfordshire is pleased to see that many of our recommendations to make the heritage policies sound have been adopted in the main modifications.

However, there remain significant gaps:

The references to Registered Parks which are national designations and to which important specific considerations and interactions with other policies apply are limited to supporting text (paras 3.323-4 as modified). The second of these should be reworded to be more fully applicable and be presented as a Policy:

PROPOSALS THAT WOULD LEAD TO THE HARM OR TOTAL LOSS AFFECT THE SIGNIFICANCE OF A REGISTERED PARK OR GARDEN OR OTHER DESIGNED LANDSCAPE OF LOCAL IMPORTANCE WILL BE ASSESSED IN ACCORDANCE WITH DEVELOPMENT POLICY 36 AND PARAGRAPHS 132 AND 133 OF THE NPPF.

The references to Historic Landscape Characterisation are only in supporting text, so there is no policy commitment to make use of this as part of informed decision-making. There needs to be a clear Policy:

THE COUNCIL WILL SEEK TO CONSERVE, RESPECT AND ENHANCE KEY HISTORIC ASPECTS OF THE DISTRICT'S LANDSCAPE AND USE THIS TO HELP INFORM GOOD DESIGN THAT IS IN KEEPING WITH LOCAL CHARACTER AND SENSE OF PLACE

There is no commitment to develop a Local Heritage Plan SDP to help develop a more comprehensive approach to the historic environment in accordance with the general NPPF policy for positive planning for the heritage, and as such the Plan as it stands is not sufficiently positively prepared, presenting no concrete means to achieve the enhancements and public benefits that NPPF requires.

This needs an additional Policy:

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.

b) Landscape

CPRE Oxfordshire is very disappointed to see that there is still no landscape and AONB policy, which in our view is badly needed. For the Plan to be sound, the following Policy should be included:

FOR ALL DEVELOPMENT PROPOSALS WITHIN THE NORTH WESSEX DOWNS AONB OR AFFECTING ITS SETTING, GREAT WEIGHT WILL BE GIVEN TO THE CONSERVATION AND ENHANCEMENT OF ITS NATURAL BEAUTY AND TO FACILITATING PUBLIC ACCESS TO AND ENJOYMENT OF THE LANDSCAPE WHERE CONSISTENT WITH ITS CONSERVATION AND ENHANCEMENT. ALL DEVELOPMENT PROPOSALS WITHIN OR AFFECTING THE SETTING OF THE AONB WILL BE EXPECTED TO BE CONSISTENT WITH THE RELEVANT AONB MANAGEMENT PLAN AND SUPPORTING GUIDANCE AND POSITION STATEMENTS ISSUED BY THE NW DOWNS AONB PARTNERSHIP BOARD.

ALL DEVELOPMENT PROPOSALS WITHIN OR AFFECTING THE SETTING OF THE AONB WILL FURTHER BE EXPECTED TO BE DESIGNED HAVING REGARD FOR THE RELEVANT LANDSCAPE, HERITAGE AND BIODIVERSITY CHARACTERISTICS OF THE AONB AS REFLECTED IN GUIDANCE DOCUMENTS AND OTHER RESOURCES PUBLISHED BY THE NW DOWNS AONB PARTNERSHIP BOARD.

c) Setting of Oxford

CPRE Oxfordshire is disappointed that there is still no proper policy for conserving the setting of Oxford and its skyline as an internationally important major cluster of heritage assets. This appears not to have been prepared with due regard to Duty to

Co-operate obligations in respect of cross-authority responsibilities and statutory agencies' roles in respect of formulating consistent policy towards the setting of Oxford's internationally important heritage assets (Grade I, II*, II Listed Buildings and similarly Graded Registered Parks within several Conservation Areas). For the Plan to be sound, the following Policy should be included:

PROPOSALS FOR DEVELOPMENT THAT AFFECT THE SPECIAL CHARACTER AND LANDSCAPE SETTING OF OXFORD WILL BE EXPECTED TO PRESERVE AND/OR ENHANCE ITS HISTORIC AND VISUAL SIGNIFICANCE IN ACCORDANCE WITH STATUTORY PROVISIONS OF THE 1990 LISTED BUILDINGS AND CONSERVATION AREAS ACT AND NATIONAL POLICY TO SAFEGUARD THE HISTORIC ENVIRONMENT, ESPECIALLY IF THEY ARE LOCATED WITHIN VIEWS OF OR FROM THE CITY. IN ACCORDANCE WITH THE GUIDANCE AND TESTS SET OUT IN NPPF PARAGRAPHS 128-135, GREAT WEIGHT WILL BE GIVEN TO PRESERVING AND ENHANCING THE CITY'S SETTING AND DEVELOPMENTS WILL NOT BE PERMITTED THAT, WITHOUT CLEAR AND CONVINCING JUSTIFICATION, WOULD:

- HARM THE SETTING OF THE INTERNATIONALLY AND NATIONALLY IMPORTANT LISTED BUILDINGS, CONSERVATION AREAS AND REGISTERED PARKS AND GARDENS THAT FORM THE ICONIC SKYLINE OF OXFORD, INCLUDING EFFECTS ON VIEWS OUT FROM AND ACROSS THE CITY AND/OR ON THE HISTORIC CHARACTER OF ITS SURROUNDING LANDSCAPE.
- HARM THE HISTORIC LANDSCAPE SETTING AND CHARACTER OF OXFORD.

OXFORD CITY COUNCIL'S HERITAGE PLAN DOCUMENTS AND POLICY ON THE LANDSCAPE SETTING OF OXFORD AND VIEWS IN RELATION TO OXFORD'S SKYLINE WILL BE TREATED AS MATERIAL CONSIDERATIONS IN DETERMINING PROPOSALS TO WHICH THIS POLICY APPLIES.

d) Dark Skies

While CPRE is pleased to see a positive dark skies paragraph (para 3.149) for the AONB and its setting, it is disappointing that this is not a more generally applicable consideration. This is not in line with Government policy which suggests a much more proactive approach to reducing existing pollution, and the following should be added to the end of para 3.149:

SIMILAR CONSIDERATIONS TO ENHANCE DARK SKIES WILL BE APPLIED DISTRICT-WIDE.

Policy 21 is needed:

Development Policy 21: External Lighting AND DARK SKIES

DEVELOPMENT PROPOSALS SHOULD BE LOCATED IN SUSTAINABLE LOCATIONS AND SHOULD BE DESIGNED TO ENSURE THAT THEY AVOID, MINIMISE AND WHERE POSSIBLE REDUCE OR REVERSE THE ADVERSE IMPACT OF LIGHT POLLUTION ON HUMAN

HEALTH, THE NATURAL ENVIRONMENT AND/OR LOCAL AMENITY, INCLUDING EFFECTS ARISING IN COMBINATION WITH PAST OR CONCURRENT DEVELOPMENT

Development that involves external lighting will ONLY be permitted WHERE:

- i. there would not be an adverse effect on the character of the area, the amenity of neighbouring uses or on local biodiversity
- ii. there would not be a hazard for pedestrians or people using any type of transportation, and
- iii. the lighting proposed is the minimum necessary to undertake the task for which it is required.

Where permission is granted for external lighting, conditions may be imposed that require:

- iv. the fitting of devices to reduce glare and light spillage, and
- v. restricting the hours during which the lighting may be operated.

IN ORDER TO ENSURE THAT THE DARK SKIES OF THE DISTRICT ARE CONSERVED AND ENHANCED, THE COUNCIL WILL:

- SEEK TO AVOID OR MINIMISE LIGHT POLLUTION FROM NEW DEVELOPMENT ACROSS THE DISTRICT, DEFINING ENVIRONMENTAL LIGHTING ZONES WHERE APPROPRIATE ENSURING THAT APPROPRIATE LIGHT MANAGEMENT TECHNOLOGIES AND PROGRAMMES ARE IMPLEMENTED
- DEVELOP/ADOPT TECHNICAL GUIDANCE TO HELP INFORM LIGHT MANAGEMENT THROUGH USE OF TECHNOLOGY AND OTHER MEANS
- ONLY PERMIT THE INSTALLATION OF EXTERNAL LIGHTING FOR RURAL BUILDINGS WHERE:
 - I) THE MEANS OF LIGHTING IS APPROPRIATE, UNOBTRUSIVELY SITED AND DO NOT INVOLVE EXCESSIVE LEVELS OF LIGHT;
 - II) THE ELEVATIONS OF BUILDINGS, PARTICULARLY ROOFS, ARE DESIGNED TO LIMIT LIGHT SPILL;
 - II) THE PROPOSAL WOULD NOT HAVE A DETRIMENTAL EFFECT ON LOCAL AMENITY, CHARACTER OF A SETTLEMENT OR WIDER COUNTRYSIDE, INTRINSICALLY DARK LANDSCAPES OR NATURE CONSERVATION
- LIAISE WITH THE HIGHWAYS AUTHORITY AND OTHERS TO REDUCE LIGHT POLLUTION FROM EXISTING SOURCES BY INSTALLATION OF LESS LIGHT-POLLUTING TECHNOLOGIES AND SMART CONTROL OF LIGHTING
- SUPPORT THE DESIGNATION OF DARK SKY DISCOVERY SITES AND AREAS
- SUPPORT COMMUNITY INITIATIVES TO REDUCE LIGHT SPILL FROM EXTERNAL LIGHTING AND PROMOTE OTHER COMMUNITY DARK SKIES INITIATIVES TO DEVELOP AWARENESS AND GOOD PRACTICE.