

# North Wessex Downs National Landscape Management Plan Review

1. The following is a response from both South Oxfordshire District Council and the Vale of White Horse District Council to the public consultation on the North Wessex Downs National Landscape Management Plan review.

2. OX14 3JE

3. To what extent do you agree with the Vision for the North Wessex Downs as outlined in the draft Plan? (See Chapter 1, Context and Framework, page 5.)

- ☐ Strongly agree
- ☒ **Agree**
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

#### 4. Do you have any comments about the Vision?

**Vision** – It is suggested that an introductory sentence is added prior to the presentation of the Vision, it would also be more easily digestible if broken up into at least two paragraph lines as follows:

*Vast dramatic, undeveloped and distinct chalk downlands with nationally significant areas of semi-natural chalk grassland, contrasting with well-wooded plateaux, arable farmland, heathland and intimate and secluded valleys, all rich in wildlife and cultural heritage;*

*A high quality landscape of national and international significance ~~which persists in increasingly urbanised surroundings~~; where people live, work and relax; where visitors are welcomed and contribute to a vibrant rural economy; ~~and where~~ access supports the health and wellbeing of local residents and visitors alike.*

**Vision** – the words ‘*which persists in increasingly urbanised surroundings*’ sound quite negative for a vision – It is suggested they are removed.

##### **Long Term Goals:**

- We suggest an amendment for clarity in **bullet point 2**: *..and other forms of development display high quality design worthy of one of England’s ~~designated~~ finest **designated** landscapes.*
- Suggested amendment for clarity in **bullet point 3**: *..with thriving land-based and other rural enterprises that prioritise conserving and enhancing the valued qualities of the North Wessex Downs. This **will** ensures a countryside rich in wildlife, heritage, and recreational opportunities, while producing high-quality products through sustainable farming practices that benefit both the local economy and the surrounding countryside*
- Further clarity is required in **bullet point 9**. Where it states - ‘*the dominance of roads and clutter are reduced*’ it is not clear what is meant by ‘clutter’.

#### 5. Which chapter(s) of the Draft Management Plan is/are most important, useful or of interest to you in your work, for your business or organisation or personal life? (You can select more than one.)



Context



Landscape



Rural Land Management



Biodiversity

- ☒ Historic Environment
- ☒ Natural Resources
- ☒ Development
- ☒ Communities
- ☒ Tourism, Leisure and Access

Please explain why:

As a Local Authority that contains areas of the North Wessex Downs National Landscape, all sections of the plan are of importance.

6. Are there any specific areas or issues either missing, or that you feel need more attention? Please explain why.

No, however as mentioned later, we would like to have the opportunity to comment on the revisions to Chapter 2 (Landscape) before the final version of the plan is published for adoption by the Local Authorities.

7. Do you agree that the Draft Management Plan is clear and easy to understand?

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

Please provide additional comments.

Overall, the revised Management Plan presents a very comprehensive description of the National Landscape and is well regarded by both officers and members at both South Oxfordshire and the Vale of White Horse District Councils'.

Some sections of the Management Plan are however still too long and a lot of the descriptive text (which tends not to change much over time) may be better placed in an appendix or, perhaps provided as a link to a document housed on the web site.

Simple changes like this would significantly shorten the plan and make it much more digestible for all audiences.

8.

Are there any significant factual errors in the Draft Management Plan that should be corrected?

There are many minor typos and drafting errors which need to be corrected following a thorough review of the draft plan, but no significant factual errors were identified.

## Questions about individual chapters

Please share your comments on the specific chapters which interest you. You do not have to comment on all chapters. For each chapter you may wish to consider the policies proposed, the priorities proposed or if there is anything missing from the chapter.

9. Chapter 1: Context and Framework. Please share any comments on this section here:

**On p.5** – some of the bullet points describing the long-term goals still refer to *special qualities* rather than *valued qualities* - for example BP 2 and BP 7 and paragraph 1.2.

**Overarching Principles** (p.11)

- Overarching principle 4 states '*No major development should take place either in the North Wessex Downs National Landscape or where it would harm the setting*'. This is going beyond national policy in the NPPF, which does allow major development if exceptional circumstances and public interest tests are passed, and doesn't apply in the same way to the setting of the NL. This needs re-drafting, and we recommend you consider the following amendment for clarity: "*No major development should take place either in the North Wessex Downs National Landscape, or where it would harm the setting, **except in exceptional circumstances***". We note you go into fuller detail in Chapter 7 on the NPPF.

For information, our emerging Joint Local Plan for South and Vale uses these words:

*"Major development will only be permitted in the National Landscapes in exceptional circumstances, and where it can be demonstrated that the development is in the public interest, that alternative locations (outside of the National Landscape) have been considered and excluded, and that any detrimental effect on the environment, the landscape and recreational opportunities will be minimised and mitigated."*

- It is not clear what principle 12 means. This principle should either be re-written to make it clear what it means or, deleted.

10. Chapter 2: Landscape. Please share any comments on this section here:

Our understanding is that Chapter 2 has yet to be amended, and changes will be made in May/June 2025, following the completion of the Landscape Character Assessment. Given that the landscape is one of the key sections of the plan both South Oxfordshire District Council and the Vale of White Horse District Council would like to be consulted on the amended version of this chapter **before** final draft of the Management Plan is published.

11. Chapter 3: Farming and Land Management. Please share any comments on this section here:

**Paragraph 3.12** - We disagree with the statement made in the second sentence of this paragraph where it says, "*There is limited scope for new [woodland] planting given the landscape, heritage and biodiversity characteristics for which much of the North Wessex Downs is designated*". There is in fact huge scope for planting new trees and woodlands, provided the right trees are planted in the right places. This statement is overly cautious and at odds with the need to both restore biodiversity and sequester carbon at scale. We request that this statement is revised, and more positive language is used to recognise the need for tree planting but to ensure that the planting is done responsibly.

**Paragraph 3.22** - is supposed to be describing the valued qualities of hedgerows in the farmed landscape however, the text - "*Hedgerows containing some mature trees in the vales and river valleys*" is very weak and does not describe the valued qualities of hedgerows across the National Landscape. We suggest that this text is revised along the following lines "*Hedgerows act as important connectors and wildlife corridors across intensively farmed landscapes*".

An additional 'Valued Quality' should be added to the list at 3.19-3.24 to reflect that farmers and land managers are key to the delivery of Nature Recovery in the National Landscape, without their support and co-operation Nature Recovery in the NL will not be achieved.

12. Chapter 4: Biodiversity and Nature Recovery. Please share any comments on this section here:

**Paragraph 4.26** – apportioned targets. It would be helpful here to show the current baseline for the North Wessex Downs (if possible) as the figures are largely meaningless without this context. If the data is not available, then it is worth re-iterating this point here and incorporating the collation of this baseline data into priority 2 on page 7.

**Paragraph 4.28** - We do not agree with the statement that "*Target T2 poses challenges in the NWDNL, given at least 12% of the landscape is already woodland and much of it is not suitable for new planting*". There is in fact huge scope for planting new trees and woodlands provided the right trees are planted in the right places. We request that this statement is revised to present a more positive approach to tree planning whilst ensuring that this is done in a way that protects the valued quality of the NWD NL.

13. Chapter 5: Historic Environment. Please share any comments on this section here:

**Paragraph 6.13** – It would be helpful if a link to the Historic Landscape Characterisation document could be added to this paragraph.

14. Chapter 6: Natural Resources. Please share any comments on this section here:

No comments.

15. Chapter 7: Planning and Development. Please share any comments on this section here:

**Paragraph 7.11** – We suggest the following addition to the third sentence:

*“This includes suburbanisation due to settlement extensions and smaller intrusions including changes to residential curtilages, extensions and outbuildings allowed as permitted development, street clutter/signage, increased traffic, ~~and~~ noise and lighting”.*

**Paragraph 7.45** – Point d. We would recommend a reference to excessive glazing is added to the list of potential issues affecting the rural character of the NWD.

**Policy DE14** – Are the ‘important views’ referenced in this policy referenced or defined anywhere?

16. Chapter 8: Communities

No comments.

17. Chapter 9: Access, Recreation and Tourism

Strong support for Policy **ART05**. The councils’ see the NWD NL as a public asset and encourage respectful use of the open spaces.