

Stage 2 Matters and Questions**Matter 6 – Proposed Housing Sites in the North Wessex Downs AONB (6.1)**

Para. 115 of the NPPF is clear that *“great weight should be given to conserving landscape and scenic beauty in [inter alia] Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty”*. Para. 116 then goes on to advise that planning permission should be refused for major developments in AONBs except in ‘exceptional circumstances’ and where it can be demonstrated that they are in the ‘public interest’. The NPPF sets out three criteria that should be considered when assessing whether the ‘exceptional circumstances and public interest’ tests may be satisfied in respect of major development proposed in the AONB. We will consider each of the three tests individually in respect of strategic housing allocation sites 12 and 13 included in the emerging Local Plan.

(1) The Need for Development

As explained under Matter 5, whilst there is a requirement for the Council to meet its full, objectively assessed housing need as per para. 47 of the NPPF, there is insufficient evidence provided by the VoWH to justify extensive housing development within the AONB on a housing need basis. The NPPF is clear at para. 17 that *“allocations of land for development should prefer land of lesser environmental value”*, with AONBs provided with the highest status of national protection given their inherent landscape and scenic beauty.

As with land at Stockham Farm to the west of Wantage, there are sites which are available, suitable, achievable and viable and located outside the AONB. We have similar concerns to those set out under Matter 5 that the Council has not fully explored the availability of land outside the AONB to accommodate new housing which would negate the need to develop in areas such as the AONB and Green Belt which are afforded the highest levels of national protection. In this respect, we have particular concerns regarding the robustness of the February 2014 SHLAA (ref. HOU09) which is limited in scope with the Wantage appendix (ref. HOU09_24) being a good example with land to the west of the main settlement not being assessed whereas land to the east of the main settlement is assessed and subsequently proposed for housing allocation as Crab Hill (site 14).

The Council has not adequately demonstrated that the full, objectively assessed need for market and affordable housing in VoWH cannot be delivered on land falling outside the AONB. As has been demonstrated in respect of land at Stockham Farm to the west of Wantage, this sizable site on the edge of one of the Vale’s most sustainable market towns is available, suitable, achievable and viable for development without reliance upon development within the AONB. Looking purely at housing need, it is evident that there is sufficient land outside the AONB which is available in the VoWH to negate the need to develop within the AONB and therefore the ‘exceptional circumstances and public interest’ test in respect of housing need is not met – 700 / 800 of the new homes identified at the Harwell Campus within the AONB could be accommodated on land at Stockham Farm, west of Wantage for instance.

It is recognised that the Harwell Campus has an international reputation and is a significant contributor to the local and national economy. It is also recognised that it is critical that the level and type of housing required to accommodate those that work at Harwell, and to attract those who may wish to work at Harwell in the future, is provided. However, there is little evidence provided alongside the Local Plan which suggests that large scale housing development is required

immediately adjoining the Harwell Campus within the AONB. Whilst evidence exists that suggests a small number of new homes are required on the campus to accommodate core or visiting members of staff who need to be in close proximity to their place of work, this is far less than the 1,400 new homes proposed within the Local Plan.

Whilst the continued support and development of the Harwell Campus does represent a potential 'exceptional circumstances and public interest' test which could justify development within the AONB, there is insufficient evidence that the continued success and international standing of the facility would be affected if the proposed 1,400 new homes were not delivered immediately adjacent to the campus. Whilst the campus does rely on sufficient homes being delivered to accommodate a future workforce, there is no evidence to suggest that these must be immediately adjacent to the campus within the AONB. There is sufficient land outside the AONB, with good existing and proposed road and public transport links to the Harwell Campus, to deliver those new homes required to house a future workforce. Land at Stockham Farm, west of Wantage is an example of land outside the AONB able to accommodate 700-800 new homes which is a current 15 minute drive and will be significantly less post the completion of the Wantage Eastern Link Road and significant public transport improvements set out in emerging Local Plan Policies 17, 18 and 19.

As land is available outside the AONB which is able to accommodate housing with ease of accessibility to the Harwell Campus via road and public transport links, it is not considered that the economic role of the facility satisfies the 'exceptional circumstances and public interest' test. If it is considered that a proportion of housing is required immediately adjacent to the campus for core employees or visitors within the AONB, such housing should be occupancy restricted to ensure its continued link to the campus in perpetuity.

(2) Cost and Scope of Developing Outside the AONB

As per the above, it is not considered that the Council has adequately demonstrated that insufficient land is available outside the AONB to accommodate housing required to support the future growth and development of the Harwell Campus. A number of suitable sites have been discussed during the Stage 1 Hearing Sessions and land at Stockham Farm, west of Wantage has been provided as an example of land outside the AONB, sustainably located, able to deliver 700-800 new homes and benefitting from close proximity to the Harwell Campus either via private car or public transport modes.

(3) Detrimental Effects on the Environment, Landscape and Recreation

We understand that the proposed allocation of strategic housing sites 12 and 13 represents the largest AONB housing development in the country. It is therefore inevitable that any development of this scale will conflict with the landscape quality and scenic beauty of the countryside which is inherent in the AONB designation to a degree that cannot be fully mitigated. Such harm can therefore only be justified via the NPPF para. 116 'exceptional circumstances and public interest' tests which, due to the availability of housing land located outside the AONB and in close proximity to the Harwell Campus, cannot be considered to be satisfied looking at either housing need or economic development. It is however considered that a smaller number of homes for core or visiting workers could be justified immediately adjacent to the campus if occupationally tied to the facility.

We note the robust objections to the proposed housing allocations in the AONB put forward by the AONB Board and Natural England.