

VALE OF WHITE HORSE LOCAL PLAN 2 EXAMINATION

SUBMISSION BY EAST HENDRED PARISH COUNCIL, June 2018.

MATTER 1: DUTY TO COOPERATE & OTHER REQUIREMENTS.

QUESTION 1.1. What are the Strategic Matters relevant to LLP2?

1. The Parish Council seeks clarification as to why Local Plan Part 2 (LLP2), which should be dealing with Non-Strategic Matters, seeks to review Local Plan Part 1 (LLP1), the Strategic Policy 15b on Harwell Campus, so soon after its adoption in Dec 2016. Since Dec 2016, the general objectives of Harwell Campus to become a World Class Location for Science & Technology have not significantly changed.
2. The LLP1 Inspector considered LLP1 “sound” with a housing land supply surplus of 1,308 dwellings (Source: Table 1 of Doc. PC1A, Vale’s Response to Doc. PC1, Inspector’s Preliminary Question 1).
Why would LLP2 not be sound with a similar housing land surplus?
3. The South Oxfordshire Core Strategy 2012, Tables 7.2 & 7.3, was found to be “sound” with a housing land supply surplus of 13 dwellings in Didcot, (a 6,313 dwelling supply compared to a requirement for 6,300 dwellings), and 157 dwellings in the Rest of the District (5,344 dwellings supply compared to a 5,187 dwelling requirement). Its current review is justified because the housing requirement has based on the withdrawn South East Plan. This demonstrates that the LLP2 proposed housing land supply surplus of 2,026 dwellings is unusually high in a Rural District in this area.
4. The Parish Council consider the review of LLP1 Policy 15b has not been fully justified so soon after the LLP1 Inspector concluded that there were no exceptional circumstances for large scale housing development in the North Downs AONB, either adjoining or within the Campus itself.

QUESTION 1.8: Have the effects of LLP2 been adequately addressed?

1. The Parish Council considers that the failure of the Sustainability Appraisal to assess reasonable alternatives to large scale housing development in the North Downs AONB has not been fully justified.

COMMENTS ON NON-TECHNICAL & SUSTAINABILITY APPRAISAL (SA) FINDINGS , page 12 onwards of Non -Technical Summary report.

2. Paragraph 6.2.10 of the SA says that LLP2 housing allocations may be necessary to meet part of the 2,200 home Oxford unmet need in South East Vale. The LPP2 has determined that South East Vale does not need to meet this need, so this is no longer a justification for Harwell Campus proposals.
3. Paragraph 6.2.12 says LLP2 housing allocations need to be considered to support Science Vale & Didcot Garden Town objectives. However, these can be met by providing a similar housing land supply surplus to LLP1, and by the review of the South Oxfordshire Local Plan 2033, which also makes proposals for Didcot Garden Town. Didcot Garden Town proposals need to comply with the adopted development plans of both Districts, not the other way around.
4. The LLP1 Inspector's Interim letter dated 6th June 2016 said that the Council may wish to consider the need to allocate replacement sites. That does not preclude the Council from assessing reasonable alternatives, including not providing alternative sites, given that he found LLP1 "sound" and now able to provide a 5 year land supply without alternative sites adjoining or within Harwell Campus.
5. Table 6.2 of the SA shows that all 4 Options included Large Scale development at Harwell Campus, albeit of a range of 250-1,000 homes. However, the Non-Technical Summary, page 6, confusingly shows no reasonable alternatives to 1,000 dwellings at Harwell Campus.

6. **HOMES** – An LLP2 with the omission of 1,000 dwellings at Harwell Campus would have met the Oxfordshire Strategic Housing Market housing requirements and provided a “sound” development plan, based on the LLP1 Inspector’s Report. On page 15, the Non-Technical SA Report concludes that the Option that meets objectively assessed housing needs would perform well with significant positive effects, in terms of Homes.
7. Harwell Campus is a “Brand” for promoting development of the whole site. The Campus contains a wide variety of small & large companies and Government supported institutions to promote science. Each have different housing needs, just like other Business Parks, Hospitals & Universities. The Council has not justified a specific housing need for the Campus as a whole.
8. **MOVEMENT & POLLUTION** – The omission of the South East Marcham site is cited as an improvement over the alternatives sites. The omission of 1,000 dwellings at Harwell Campus would reduce daily traffic flows in the AONB, & on the A417 & the A34, which are at capacity from some 5,000 daily traffic movements at Harwell Campus. (Source: TRICS Data from recent Traffic Assessments in Planning Applications, which estimate c.5 daily trips per dwelling). Lower daily trip generation can influence pollution levels.
9. **HEALTH** – A Country Park at Dalton Barracks is seen as a spatial strategy that performs well. The Parish Council’s proposals for a 100 hectare of structural landscaping & Country Park on mainly undeveloped greenfield land around the edges of 294 hectare Harwell Campus would meet the recreation needs of settlements listed on page 54 of the main SA report. It would similarly perform well when assessed under the Health objectives.
10. It would perform even better than the Council’s Preferred Option, by complying with LLP2 Core Policy 15b for development to contribute to a comprehensive landscape plan with structural areas of open space & perimeter planting, a Country Park & proposals to avoid harm from the visual impact of buildings on the AONB. (page 3).

- 11.** See Attachment by Parish Council on Proposed Structural Landscaping & Country Park at Harwell Campus, to meet Natural England's ANGSt Green Space Standards for 100 hectares within 5 kms of every home.

INEQUALITY - The proposed Housing Mix (Core Policy 22) for Harwell Campus of 35% affordable housing, based in the Council's Exceptional Circumstances Report, is no different than for any other housing allocation. The proposed Harwell Campus dwellings are not intended to address the Future Needs of an Ageing Population, Core Policy 26). So the omission of a Harwell Campus allocation would not be contrary to Core Policies 22 & 26.

- 12. ECONOMY** - The loss of 36 hectares of employment land, mainly in the 93 hectare Enterprise Zone, in the largest and most heavily promoted employment site in the LLP1, is not fully justified. This would be contrary to the LLP1 Sustainable Strategy Proposals Plan, fig4.2, which promotes Harwell Campus as a world scale location for science & technology. It would be contrary to Core Policy 6 on land required for employment, Core Policy 15 on Harwell Campus Strategic Employment Site, and Core Policy 29, which safeguards existing employment uses.

- 13. NATURAL ENVIRONMENT** - the development of housing at Harwell Campus would have a greater impact on the natural environment than the Parish Council's proposals for structural & perimeter landscaping and a Country Park. It also provides the opportunity to remedy an identified 100 hectare deficiency in Nature Reserves in the District, identified in the Council's Green Infrastructure Strategy by Chris Blandford Associates.

14. **LANDSCAPE** – the Preferred Option proposals for 1,000 houses at Harwell Campus would amount to large-scale development in an AONB for which exceptional circumstances have not been demonstrated as recently as in LLP1 Inspector’s Report in 2016. There is a lack of sufficient structural & perimeter landscaping, and a failure to make adequate provision for large areas of open space of 100 hectares, based on the Natural England’s ANGSt standards, in the draft Harwell Campus Masterplan. That means that the Council has not shown that their Preferred Option would have less impacts, by careful Master Planning & Design, than the Parish Council’s reasonable alternative option.

15. **CONCLUSIONS & PROPOSED AMENDMENT** – The Parish Council concludes that the Council failed to consider realistic alternatives to large scale housing development in the AONB at Harwell Campus, and thus the Sustainability Appraisal is “unsound.” The Parish Council’s has prepared proposals for an alternative option, (see attachment promoting Structural & Perimeter Landscaping, and a Country Park at Harwell Campus), in place of a housing allocation, as an amendment to LLP2 Core Policy 15b.

16. The Parish Council’s alternative option is considered to have significant positive effects in terms of Homes, Movement & Pollution, Health, Economy, Natural Environment, & Landscape.