

HARWELL CAMPUS

7.1 Is the proposal in the LPP2 to allocate a site for 1,000 dwellings for an Innovation Village at Harwell Campus consistent with the strategy of the LPP1 for the district as a whole and the South East Vale Sub Area?

7.1.1 No. The Inspector for LPP1 comprehensively rejected the principle and details of major housing development at and around Harwell Campus (paragraphs 112-124). The District Council, with the support of the Harwell Campus Partnership, is essentially attempting to rerun the same series of arguments which failed two years ago. This is not what LPP2 is for.

7.1.2 The Inspector considered the various arguments put forward by the proponents and rejected them all. In his Interim Findings on 7th June 2016 the Inspector specifically requested a response from the District Council: “I seek confirmation from the Council that it is content to pursue adoption of the Part 1 plan modified to delete housing allocation sites 12 and 13 [i.e. Harwell]”, to which the Council replied on 10th June: “Yes” (see Appendix 1). The Inspector reflected this in his final Report on 30th November 2016: “There is nothing to suggest that alternative sites for this housing, outside the AONB but within/close to Science Vale could not be found if necessary” (paragraph 119). Furthermore, in his final report the Inspector, not quoted by the Council, indicated that alternative sites were not actually necessary, as there would be a 6% oversupply of sites against requirements in the district (paragraph 159). Despite agreeing to the deletion, the Council has, remarkably, tried again to put 1,000 houses in the North Wessex Downs AONB in the rejected location.

7.1.3 LPP2 is misleading on this, attempting to give the opposite impression from what the Inspector concluded. Paragraph 2.35 and the selective quote from the Inspector’s Interim Findings paragraph 9.12 imply that the Inspector advocated replacement sites to Harwell. He did not. The two sentences preceding the quote are: “I conclude that modification of the plan to delete sites 12 and 13 is thus necessary. As detailed in section 13, even without these sites the plan would provide for a five year supply of deliverable housing land, and sufficient dwellings district-wide for the plan period as a whole.” The Inspector’s principal position was therefore that deleting the Harwell sites necessitated no further action. Despite this, the next paragraph of LPP2 (2.36) then claims that it is “for these reasons” (replacement) that 1,400 additional homes are allocated in the South East Vale Sub Area. This is reiterated in paragraph 2.96 which refers to “the replacement of these sites”. This reasoning cannot be justified.

7.1.4 We set out our view on the dwelling requirement considerations relevant to Harwell and the Sub-Area under Matter 3. In summary, there is no need for the quantity of housing involved. The Council’s figures in PC01.1 (Q1) show this. There was an oversupply of over 6% in LPP1 even without 1,400 dwellings from the Harwell sites. Now there is a proposed oversupply of nearly 9%. The oversupply of around 2,000 dwellings clearly demonstrates that proceeding with the Harwell allocation of 1,000 dwellings is not necessary to meet housing needs. The proposal is clearly contrary to the LPP1 strategy.

7.2 Given the exceptional circumstances and national interest tests in the NPPF for major development in the AONB, is the proposal for an Innovation Village justified by proportionate evidence in principle?

7.2.1 No. The Inspector for LPP1 repeatedly stated that such exceptional circumstances did not exist, and this remains the position. The Council's case is based in part on a report commissioned from SQW (NAT04). We commented on that report in our Regulation 19 consultation response and do not repeat it here. Our main responses to the Council's arguments for 'exceptional circumstances' (in terms of NPPF 116) for developing 1,000 houses in the AONB at Harwell Campus are set out below, focused on LPP2 paragraph 2.116.

(i) There is extensive evidence that research and development at Harwell Campus is of enormous importance. It is a site of which all of us can be proud. Unfortunately LPP2 sometimes confuses the reasonable economic and related benefits with the alleged benefits of housing on the site. This happens twice in its claims for exceptional circumstances in paragraph 2.116. First, the claim that 'The development [proposed in the Plan] is in the public interest' emphasises scientific facilities and does not even mention housing, merely claiming that "Taking steps to ensure a significant return on investment is certainly therefore in the public interest." Second, one of the four elements of the claim that 'the cost of developing elsewhere is greater and the scope for doing so is very limited' concerns purely the Enterprise Zone and its capacity to support employment growth, again not mentioning housing.

(ii) The claimed 'need for the development', particularly for a 'work-live-play' community, is the same as the one rejected by the Inspector at LPP1. Little attempt has been made to overcome the counter-arguments used by the Inspector. No explanation has been given of why 1,000 houses are needed. Paragraph 2.107 undermines the case by clarify that this 'community' will be "designed to provide new homes for both permanent and transient employees working both at the Campus and within Science Vale". The Science Vale employees could clearly live elsewhere, not in the AONB. With about two thirds of the homes in the private sector, occupants could largely work anywhere and not need an AONB location for residence. What is actually proposed is not the "single sustainable community" (i.e. just for the benefit of the Campus) claimed subsequently regarding alternative sites.

(iii) The claim that non-allocation "would be detrimental to the local economy" was roundly rejected by the Inspector at LPP1s: "there is no convincing evidence to indicate that refusing such development would have an adverse effect on the local economy" (paragraph 118).

(iv) The final claim regarding alternative sites for housing – that a wide range has been reviewed in the area and found to be constrained – is unacceptable. There is no need to find alternative sites to meet South East Vale's housing needs, but, if there were, the Council previously told the Inspector at LPP1 that they could be found.

(v) Regarding detrimental effects on the environment, the Plan states that "the land proposed for development at Harwell Campus is already allocated for development and is predominantly brownfield". This is a half-truth: Local Plan 2011 Policy E7 and LPP1 Core

Policy 6 both allocate only the land south of the Icknield Way, not the north-eastern extension. Furthermore, both allocations are for employment rather than housing. Housing would have very different immediate and wider consequential impacts. Also, the allocation site now proposed contains a significant greenfield component.

(vi) We dispute that “the proposed residential development at Harwell Campus would have limited impact on the landscape setting of the AONB and those limited impacts that have been identified are capable of being successfully mitigated”. We commented on this at the Regulation 19 stage and also attach our own commissioned assessment of the landscape and visual effects as Appendix 2. This draws different conclusions from the LVIA by HDA on the following key points:

- There will be harm to the natural beauty and scenic qualities of the North Wessex Downs AONB;
- There will be harm to the character and setting to the Icknield Way and, as a consequence public enjoyment of the route;
- There will be significant visual harm to views from the north and west of the allocation Site, from locations within the AONB and on the Icknield Way: some of these are demonstrated in HDA Photomontage 1;
- Development on the scale proposed is likely to result in extensive tree removal and a loss of the open character of the existing campus, all of which lies within the AONB;
- Conclusions drawn by HDA as to the residual benefits of landscape infrastructure and planting are premature (due to the lack of detail at this stage) and also largely ignore the harm which will result as a consequence of the development itself.

7.2.2 More broadly regarding the possible justification for the allocation, we view the proposal as simply a major housing development of no special merit. We do not accept the point in Core Policy 15a that “The additional allocation proposed at Harwell Campus is specifically proposed to help meet the identified business and local economic needs of the Campus”.

7.2.3 The AONB Unit has previously been clear that it is sympathetic to the Campus Partnership’s original idea that a modest number of dwellings could reasonably be provided on the Campus to meet the needs of short term visiting and research staff. This kind of tied accommodation appears to have been provided for adequately in the permission granted in January 2016 on application P15/V0575/EZ (see our Regulation 19 consultation response). The Campus Partnership is building a new leisure complex which will include places to eat, a shop, a gym and accommodation. This seems to provide the opportunity for staff across the Campus to congregate and share ideas. That should support a genuine ‘innovation village’.

7.2.4 Very different from this is the 1,000 houses proposed in the allocation. The Council and the Campus Partnership rightly see this for what they describe in SCG01 as: a “site for strategic housing development” (paragraph 1.3). We have shown in paragraph 7.2.1(ii) above that the houses would serve the whole Sub-Area and not just Harwell Campus. Occupancy of most dwellings would not be confined to staff working at the Campus (or in the R&D sector): they would be available for purchase or rent in the private market. We are not at all reassured by the statements between the parties in SCG01 that “At present, the intention of the Campus Partnership is to retain ownership of the majority of the new

homes and to maintain control over the site as a whole” (the second paragraph 2.2). The intention is that about one third of the homes should be sold on the open market (which shows their irrelevance to a dedicated ‘need’ on the Campus), and a further third would be for private rent. Even if the Campus retained ownership of all these, plus all the affordable housing, the private sector usage of two thirds of the properties would not be tied to Campus purposes. We have additionally shown in paragraphs 3.1.7-8 (on Matter 3) that the commitment to provide below-market rents is limited to 35% of the properties, which is that intended by the Council’s policy in any event. To that extent the offer is no better than can be obtained in accommodation a short distance away outside the AONB. In our view the ‘Innovation Village’ is little more than an enticing expression.

7.3 Is the use of employment land for the proposed Innovation Village compatible with the long term employment objectives for Harwell Campus and the Enterprise Zone?

7.3.1 No. The Inspector for LPP1 rejected this argument too at paragraph 122, concluding “An alternative proposal to housing allocation site 13 has been put forward, involving the development for housing within the northern part of the Harwell Campus itself. This would... involve the development for housing of land recently designated as Enterprise Zone and would reduce the amount of employment land available at the campus.”

7.3.2 LPP1 Core Policy 6 allocates 93ha in the Enterprise Zone (though NAT04 notes in Figure 7.1 that 21.04ha are ‘non-developable’) and a further 35ha outside this, all within the Campus, as available development land for meeting business and employment needs. The 107ha allocated (93 + 35 – 21) are expected to provide the land for the 3,500 jobs proposed in LPP2 Core Policy 15b. The amount of space those jobs will take depends on their density. At present the 5,500 people working on the campus (NAT04 paragraph 1.2) occupy the 162ha on the rest of the site (approx. 290ha¹ minus approx. 128ha). They must have a gross density of 34 employees per hectare. If the same density was used on the net 107ha of land allocated in Core Policy 6, 103ha would be occupied, leaving little land for future growth beyond 2031.

7.3.3 The allocation site in Core Policy 15a covers 36.78ha (CSD01.1 Appendix A). Part of this we assume to be outside the c.290ha Campus boundary. There would not be sufficient space for the proposed housing development of 1,000 houses on the assumptions above. On this basis, Harwell Campus would reach its development limits around 2031. There would then be enormous pressure for the Campus to expand outwards into greenfield AONB territory, probably to the east. All the land surrounding the Campus, like the Campus itself, is designated AONB. On the assumptions above, there is a clear medium-term threat to the AONB from inappropriate development by using up land on the campus in the short to medium term, even without the housing development proposed.

7.3.4 The proposal from the Council in the SQW report (NAT04) contrasts with the above assumptions in suggesting that future employment densities will be over 178 employees per

¹ The area of Harwell Campus is variously described e.g. as ‘just under 300ha’ (NAT04), ‘around 294ha’ (LPP2 paragraph 2.103), and ‘287ha’ (SCG01), none of which state whether this includes the area north-east of the Icknield Way within the proposed allocation site (CP15a).

hectare, more than five times current practice. That is such an abrupt change of employment pattern for what is still intended to remain primarily a high technology R&D facility that the proposals should be treated with some caution. NAT04 assumes that 40% of employment land will be taken up by offices (a higher proportion of land than any other category), which have particularly high density employment per hectare. On that basis the employment land available at the Campus would last distinctly longer, but it is far from clear that the priority for the Campus should be the promotion of prime office space.

7.3.5 We consider implausible the idea that the strategic housing allocation and all the employment use intended on the Campus by 2031 will use only a modest proportion of the available land on the Campus. That is not the language of the submitted Plan. For example, Core Policy 15b explains that “Development proposals will be considered in the context of a comprehensive approach to the whole Campus, in accordance with the criteria set out below. Additional guidance will be provided by a comprehensive development framework that will be published as a Supplementary Planning Document...”. Likewise, previous versions of the Campus Masterplan have all indicated comprehensive development of the whole site, typically expected by 2037 (the end date of the Enterprise Zone). We conclude that Harwell Campus should not be squandered by using it for a major housing development, as this will bring forward the date when Harwell Campus can be expected to press for development on greenfield land in the AONB outside the Campus’s existing boundary having prematurely used up all its own land.

7.3.6 We also consider that Enterprise Zones should not be used as strategic housing sites: these were identified instead to boost business development. Providing on-site housing is completely absent from the Government’s case for what they should do (<https://enterprisezones.communities.gov.uk/about-enterprise-zones/>)².

7.4 Is the proposal for an Innovation Village appropriate when considered against reasonable alternatives (if any) in the light of site constraints, infrastructure requirements and potential impacts? Have these been adequately assessed? How would the Innovation Village be delivered and managed in the long term to ensure it meets its objectives? Are the detailed requirements in Core Policy 15b and the site development template requirements – both general and site specific – justified and would they provide an appropriate basis for the preparation of a Supplementary Planning Document for the site?

7.4.1 Innovation Village is the new form of words used by the Council to promote a ‘work-live-play’ community on Harwell Campus (the language of the LPP1 Examination). LPP2 paragraph 2.107 claims that “To achieve its full potential, the campus needs to evolve from a Science and Innovation Park to a world class campus environment offering a work-live-play community. The new work-live-play community will be delivered as an Innovation Village...”. This is reiterated in paragraph 2.116. This was wholly rejected by the Inspector for LPP1 (paragraphs 114-118). See also our paragraph 7.2.1(ii) above.

² Accessed 8th June 2018

7.4.2 The Council's latest proposals in LPP2 are strikingly similar to those found wanting in LPP1. Our Regulation 19 consultation response was critical of the failure of the Council (in its commissioned report NAT04) to address basic questions such as those raised by the LPP1 Inspector.

7.4.3 The idea that researchers and other people living in the proposed 1,000 dwellings at Harwell would do all their living, working and playing on the site is fanciful. The settlement would function just like any other settlement of similar size, with basic requirements met locally but most services accessed well-distant from the Campus. For those who did choose to 'live over the shop' there would of course be much shorter journeys to work, and this by the favoured modes of walking and possibly cycling. However, large numbers of people would travel away to work. As this would be from a 'village' rather than from a town (which might well be an alternative location for residence) there is a greater chance that travel to work would be by car than if they started from a larger settlement with better public transport. With the large number of journeys having to be made to bigger settlements for higher order services, it is far from clear that there would be reduced overall reliance on cars than if the 1,000 houses were provided in a town. In the circumstances of Harwell, this means that non-car travel might well be less if housing development did not proceed at Harwell at all, and the prospective occupants instead acquired housing already planned in Didcot and elsewhere nearby.

7.4.4 As we do not consider the 'Innovation Village' is appropriate, the need for us to respond to the subsequent questions does not arise.

7.5 Are the detailed boundaries of the site justified and supported by proportionate evidence? Is the estimate of site capacity justified? Is the expected timescale for development realistic?

7.5.1 We consider that development should be confined to land allocated in Core Policy 6, with priority given to the brownfield land within the Enterprise Zone, and that this should be overwhelmingly for research and development. Our comments on site capacity and timescale are in response to Q7.3 above.

7.6 How would the proposal for the Innovation Village relate to the village of Harwell and other nearby settlements? What new services, facilities and infrastructure links would be provided and is this realistic? Is the proposal viable? Would it comprise sustainable development?

7.6.1 We consider that Didcot rather than Harwell village is likely to be the settlement to which Harwell Campus is likely to continue to relate. We do not consider that the Innovation Village as proposed should proceed, so the need for us to respond to the subsequent questions does not arise. Our comments on 'sustainability' in paragraph 7.4.3 apply. To these we can add that building 1,000 houses in the AONB is not sustainable.

11 June 2018

North Wessex Downs AONB Unit

Units 3-4, Denford Manor, Lower Denford, Hungerford, Berkshire RG17 0UN

APPENDICES

Appendix 1

Vale of White Horse DC response to LPP1 Inspector's Interim Findings, 10 June 2016

Appendix 2

Harwell Campus Landscape Appraisal, by Land Management Services, June 2018

These two Appendices are provided separately

Malcolm Rivett
c/o Ian Kemp
Programme Officer
16 Cross Furlong
Wychbold, Droitwich Spa
Worcestershire
WR9 7TA

Contact officer:
Emma Wright
planning.policy@whitehorsedc.gov.uk
Tel: 01235 422600

Textphone users add 18001 before you dial

10 June 2016

Dear Mr Rivett

Vale of White Horse Local Plan 2031: Part 1 Examination – Inspector’s Interim Findings (Requested Responses)

Thank you for your letter dated 7 June 2016.

Please find below Vale of White Horse District Council's answers to your requested responses 1 – 4:

Requested response 1: I seek confirmation from the Council that it is content to pursue adoption of the Part 1 plan modified to retain the existing Green Belt boundaries, other than in respect of housing allocation sites 1, 2, 3 and 4.

Vale of White Horse response: Yes

Requested response 2: I seek confirmation from the Council that it is content to pursue adoption of the Part 1 plan modified to delete housing allocation sites 12 and 13.

Vale of White Horse response: Yes

Requested response 3: in order to assist my determination of whether or not this allocation is soundly based I would be grateful if the Council would formally consider if, in the light of a review of current evidence, housing development of the scale envisaged in the plan is appropriate in East Hanney and if the site 6 housing site allocation is deliverable.

Vale of White Horse response:

In light of Appeal Decision (Appeal Ref: APP/V3120/W/16/3142562) the Council is of the view that the strategic site at Land South of East Hanney should be removed from Local Plan 2031: Part 1. Consideration as to whether East Hanney may be an

appropriate location for smaller (non-strategic) development could be considered through preparation of the Local Plan 2031: Part 2.

Requested response 4: in order that I can reach a view on whether or not the policy is soundly based I would be grateful to receive further comments from the Council in respect of policy CP11, having particular regard to:

(a) The lack of any indication in the policy or its supporting text of the amount of retail floorspace which would be required at Botley Central Area to meet the objectively-assessed needs;

(b) The exclusion from the boundary of the Central Area, as defined in Fig 5.3 of the plan, of a bank and a church, given their inclusion within the Botley Centre SPD Site Boundary.

(c) The inclusion of existing residential development within the Fig 5.3-defined Central Area without a policy requirement that it is replaced, noting in particular that part (iii) of the policy does require that the library and Baptist Church also included in the defined area are replaced. Whilst the SPD is not formally before me for consideration I also note that the Sustainability Appraisal Report of the SPD scores housing provision as a significant beneficial effect when neither policy CP11 nor the SPD itself require the provision of housing as part of the scheme.

Vale of White Horse response:

The Council will provide additional information to add clarity to the policy CP11 (Botley Central Area). For example, this will include:

- I. The quantum of retail floor space appropriate at Botley Central Area.
- II. Amending the Botley Central Area to include the bank and Church of St. Peter and St. Paul, to be consistent with the recently adopted Botley Centre SPD.
- III. Amending the policy (CP11) to confirm that any residential development within the defined Botley Central Area will either be retained or replaced.

If there are any questions regarding our comments, please contact Emma Wright on 01235 422600.

Yours sincerely



Adrian Duffield
Head of Planning



Land at Harwell Campus, Oxfordshire

Landscape and Visual Appraisal

June 2017

Land at Harwell Campus, Oxfordshire

Landscape and Visual Appraisal

June 2017

Contents

1	Introduction	1
2	Landscape and Visual Baseline	4
3	Description of the Proposed Development	8
4	Predicted Effects of Development	10
5	Conclusions	19

Figure 1: Location Plan

Appendix 1: Figure 2 Additional Viewpoints

Appendix 2: Figure 3: Comparative assessment of External Visibility

Appendix 3: Paragraph 5.50 from GLVIA3

1. Introduction

- 1.1 Land Management Services Ltd was commissioned by the North Wessex Downs Area of Outstanding Natural Beauty (AONB) to prepare a Landscape and Visual Appraisal in relation to proposals for the allocation of 1,000 dwellings on land forming part of the Harwell Campus, Oxfordshire, as proposed under the Vale of White Horse Local Plan 2031 (Part 2). The whole of the campus, including the proposed allocation site lies within the North Wessex Downs AONB. The proposed allocation site (the Site) is shown on the location plan below (Figure 1).

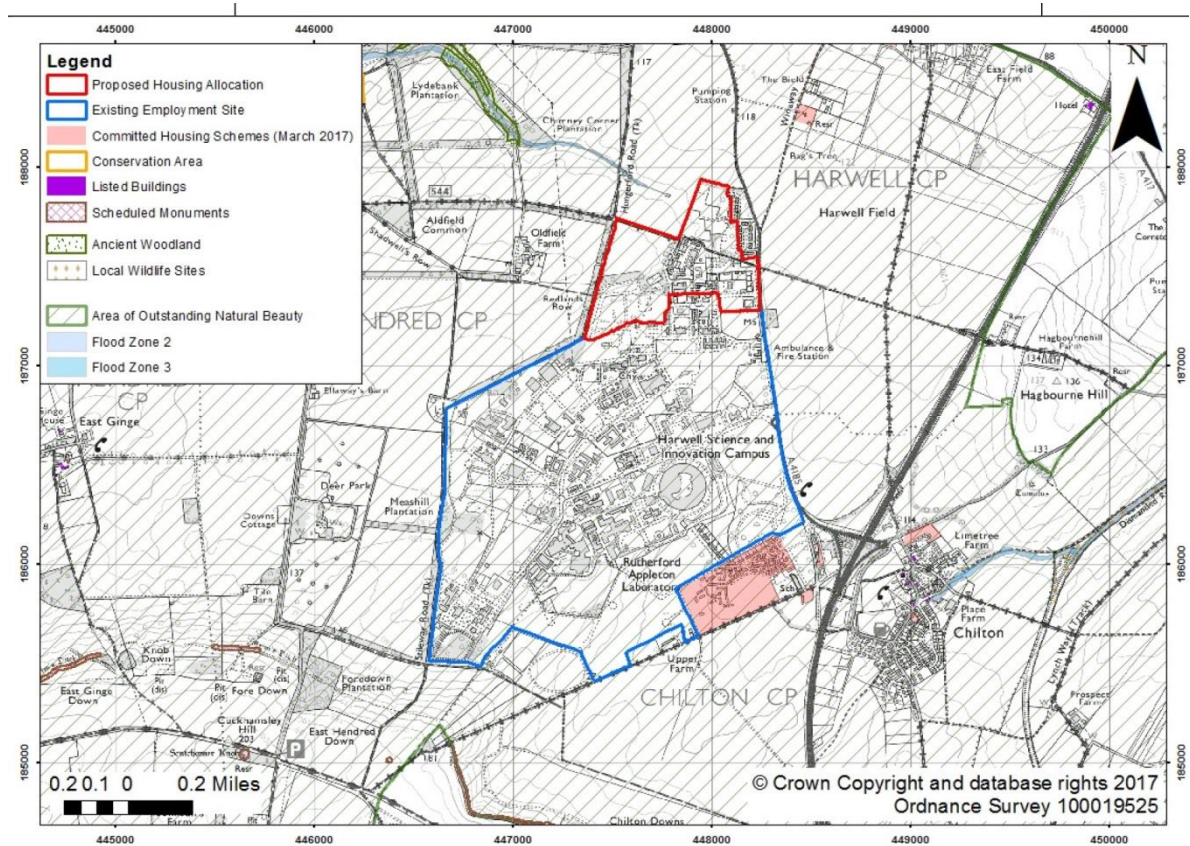


Figure 1: Land at Harwell Campus: Proposed Allocation Site

- 1.2 A Landscape and Visual Impact Assessment (LVIA) of the Site has been prepared by HDA on behalf of Vale of White Horse District Council (dated October 2017).
- 1.3 This Landscape and Visual Appraisal has been prepared on behalf of the North Wessex Downs AONB in response to the HDA LVIA and to assess the anticipated landscape and visual impacts and effects of the proposals on the landscape character and scenic beauty of the AONB.

- 1.4 The North Wessex Downs AONB objected to the proposed site allocation at Harwell Campus with reasons set out in the letter dated 22nd November 2017. With specific regard to landscape and visual impacts the AONB drew particular attention to the impacts of development in the north west field and from the Icknield Way. The AONB also noted that *assessment of landscape and visual effects of the proposal is hampered by the lack of clarity over exactly what kind of housing development might be proposed across the allocation area*. No further details of the proposed housing development have been provided since the issue of this letter in November.
- 1.5 The only plans which give an indication of the extent and character of the development are:
- HDA6 from the HDA LVIA (October 2017): Landscape Mitigation;
 - Figure 21: Proposed Heights Parameters Plan and Figure 21 Indicative Framework Plan from the Harwell Campus Framework Masterplan (13th January 2016).
- These figures relate to the whole of the campus including the allocation site.
- 1.6 The national and local policy context to this allocation site is described in detail in other documentation relating to this allocation and the Local Plan inquiry. AONB is a national landscape designation and both national and local policy affords the AONB the highest level of landscape protection. Paragraph 16 of the NPPF states that major development in an AONB should only be allowed *in exceptional circumstances*. Core Policy 44 of the Vale of White Horse adopted Local Plan states that development proposals within the AONB will only be permitted *provided they do not conflict with the aims of conservation and enhancement*.
- 1.7 The HDA LVIA adopts a methodology which is consistent with current guidance, principally that prepared by the Landscape Institute and Institute of Environmental Management and Assessment, 'Guidelines for Landscape and Visual Assessment (3rd Edition, 2013) (GLVIA3). Whilst the methodology is comprehensive, the LVIA itself is concise with little evidence of how the LVIA methodology has been applied in order to inform judgements and conclusions, specifically:
- There is reference to the published Landscape Character Assessments (LCAs) but limited analysis of the degree to which the Site and the immediate surrounding area reflect key characteristics described in the LCAs and, therefore, limited assessment of the degree to which the Site contributes to the natural beauty and scenic qualities of the AONB. The methodology sets out a detailed methodology relating to the assessment of existing landscape character, landscape value,

sensitivity and susceptibility to change but how this has been applied and informed conclusions is not evident within the main body of the LVIA;

- A series of photographs from viewpoints around the Site are included. It is agreed that these viewpoints provided a broadly representative set of viewpoints from which the proposed development is potentially visible (although this Appraisal includes a limited number of additional viewpoints). There is, however, no baseline description of each view and limited analysis of the magnitude of change and effects of the proposed development from each location;
- The LVIA lists six figures (HDA 1 to 6) prepared in support of the LVIA. There is a discrepancy between the listed plans and references within the LVIA. Plan HDA 5 shows Existing Visibility. The reference to Plan HDA 5 at Page 11 (Section 4 of the LVIA) refers to HDA 5 as showing the Proposed Development. It has not been possible to obtain a copy of the plan referred to as HDA 5 and which informs the description of the proposals in Section 4.1. Section 4.1 refers to Plan HDA 6 in the context of a Landscape Strategy for the proposals. HDA 6 shows high level Landscape Mitigation but does not constitute a Landscape Strategy.

- 1.8 This Appraisal does not present a full LVIA. This Appraisal relies on the methodology prepared by HDA, which it is agreed is consistent with GLVIA3, but identifies where different conclusions are drawn, with particular reference to the impacts and effects on the landscape character and scenic beauty of the AONB. A site visit was undertaken on 5th June 2018. This Landscape Appraisal is set out to the same structure and layout as the HDA LVIA for ease of comparison. With regard to viewpoints reference is made to the HDA viewpoint numbering where appropriate. Where additional views have been identified these have the prefix LMS and are shown on the Viewpoint Plan (Figure 2 in Appendix 1).

2. Landscape and Visual Baseline

2.1 Landscape Baseline

- 2.1.1 The Landscape Baseline prepared by HDA provides a high level description of the existing site and limited reference to the various published LCAs. Key characteristics are listed in Paragraph 3.1.5 of the HDA LVIA. In Section 1.6 of the HDA LVIA methodology a detailed approach to the assessment of existing landscape character, landscape value, sensitivity and susceptibility to change is described (in accordance with best practice as set out in GLVIA3). There is, however, very little evidence of the application of this structured approach within the main body of the LVIA.
- 2.1.2 The Site is described as lying *within the Harwell Campus* in Paragraph 3.1.2 of the HDA LVIA. Whilst this is true of the majority of the Site area, the north eastern field lies beyond the campus boundary.
- 2.1.3 The landscape to the west, north and east of the allocation site is characteristic of the wider Downs Plain and Scarp and Downs Footslopes as described in the North Wessex Downs and Vale of White Horse LCAs respectively. The Vale of White Horse LCA identifies the subtle change in character between the land to the west of the Site which lies within the FS3 Spring Line Villages Downs Footslopes character area and the more open and less undulating character of the landscape to the north and east, which lies within FS8 South Harwell Downs Footslopes. The Spring Line Village Downs character area is described as an undulating landform with more extensive woodland cover and more frequent settlements than other character areas associated with the Downs Footslopes. The tree cover often takes the form of thick shelterbelts. The land to the north and east is flat and more open, with fewer attributes such as undulating land form, hedge boundaries and woodland blocks and is also influenced by traffic noise associated with the A34, in particular to the east. The Vale of White Horse LCA identifies the panoramic views to the north, with the Downs scarp as a backdrop, as a key characteristic of the South Harwell Downs Footslopes.
- 2.1.4 There is no description of the character and appearance of the Icknield Way in the Landscape Baseline of the HDA LVIA. To the east of the Site the Icknield Way follows a tarmacked Lane. There are open, sweeping views across the arable farmland towards the Site and Harwell Campus. The Downs form a backdrop to these views. Traffic noise associated with the A34 impacts on the sense of tranquillity further east towards Hagbourne Hill. The Icknield Way runs through a broad hedged and wooded corridor through the eastern and central parts of the Site (see HDA Viewpoint 3), with occasional

glimpsed views of residential properties within the campus. There is currently a diversion in place around the de-contamination site (HDA Viewpoints 5 and 6). To the west the Icknield Way runs through undulating arable farmland, characteristic of the wider LCA. The Icknield Way follows the northern edge of the north west field within the Site as it leaves the campus.

- 2.1.5 HDA rightly attributes a very high landscape sensitivity to landscape receptors to the north and west (and on the scarp further south). This very high landscape sensitivity should also be applied to the north west field within the Site. The landscape detractors referenced above reduce this landscape sensitivity to high for the land to the east.
- 2.1.6 The Icknield Way is a national trail, within a nationally designated landscape. The HDA LVIA does not attribute a landscape sensitivity to the Icknield Way, but this should be assessed as very high, reducing to high within the campus, due to the importance of the route.
- 2.1.7 There are large areas of grassland and trees and woodland within the campus. HDA conclude that these areas should be assessed as being of low landscape sensitivity, with some features of high landscape sensitivity. These should be mapped. Plan HDA 4 Landscape Analysis does identify areas which are more sensitive to development *due to their relationship with the wider AONB*, mainly in the northern and north western parts of the Site. Although the campus does not reflect many key characteristic features of the AONB, it does nonetheless lie within the AONB and this part of the campus has a more wooded character with many smaller, more intimate, open spaces compared to the main employment areas to the south.

2.2 Visual Baseline

- 2.2.1 The visibility of the Site is mapped on Plan HDA 5. The approach taken in the LVIA seems to be that if views cannot be gained into the Site, for instance as a consequence of tree belts on the Site boundaries, this is shown on Plan HDA 5 as 'no view'. This is not the correct approach when establishing the visual baseline. The visual baseline, as correctly stated in the HDA Methodology at 1.8.2, *serves to establish the type of Visual Receptor (VR), the extent and character of existing views, the contribution that the site makes to each view/local visual amenity*. HDA note that No View should only be recorded where *no part of the site or proposed development is discernible*. If the Site boundary is visible, the Site itself should be assessed as visible from that location. The visual baseline should also not draw conclusions as to whether or not the proposed development may or may not be visible. The purpose of the baseline assessment is to establish the existing

conditions, character, appearance and visibility of the site and the susceptibility to change, value and sensitivity. The visual baseline should not draw conclusions as to whether or not the proposed development may or may not be visible.

- 2.2.2 As a consequence the statement at 3.2.3 that the '*visual envelope for the site is contained to its immediate surroundings*' is incorrect. The visual envelope should identify the extent of the area from which the site can be viewed or perceived, even if that is just the site boundary. The Site visibility as mapped on Figure HDA 5 understates the visibility of the Site from the north, west and east from the lower slopes of the scarp slope and The Ridgeway to the south.
- 2.2.3 Our assessment of the visibility of the site, assessed against that prepared by HDA is summarised in the table below. Figure HDA 5 is included in Appendix 2 as figure 3a together with a comparison with the LMS assessment of External Visibility overlain on the same plan (Figure 3b).

Location/PRoW	HDA Assessment	LMS Assessment
Icknield Way – east of site	No view	Partial or Open views between Hagbourne Hill and the site boundary – the eastern site edge is visible.
Icknield Way – within the site	Partial or open views	Partial or open views
Icknield Way – west of site to junction with FP 199/16/20	Open view	Open view
FP 199/16/20 to NW of site	Glimpse or partial view	Glimpse or partial view
A4185 north of site	Glimpse or partial view	Open view – the whole of the northern site edge is visible and much of the north west field
FP 243/17/10 to north of site as far as The Bield	No view with occasional glimpse or partial view	Open view – large parts of the northern and eastern site edges are visible
243/16/10 north of Icknield Way	No view	Partial view – much of the eastern site edge is visible.
199/16/30	Glimpse	Open view – the PRoW runs along the site boundary
199/23/30 and 199/23/40	No view	Open or partial view - the Site is clearly discernible in the upper sections of the footpath (see LMS Viewpoint 1)
The Ridgeway between Cuckhamsley Hill and Bury Road	No view or glimpse view	No view or partial view in that part of the site is visible and clearly discernible in the wider open view (see LMS Viewpoint 2 and HDA Photomontages 2 and 3)



LMS View 1: View towards the campus from PRoW 199/23/40.



LMS View 2: View towards the campus from the Ridgeway, west of Bury Road. The allocation site forms an important part of the wooded backdrop to Harwell Campus in this view

- 2.2.4 Visual sensitivity for users of the Ridgeway, Icknield Way and other rights of way within the AONB are rightly assessed in the HDA LVIA as being very high. A lower sensitivity is attributed to sections of the Icknield Way within the Site, but this should still be assessed as of high sensitivity due to the fact that this is a National Trail located within a nationally designated landscape.
- 2.2.5 Receptors on the A4185 are assessed as of medium sensitivity.

3. Description of the Proposed Development

- 3.1 As described above the text in this section of the HDA LVIA references a plan (HDA5) which according to the text in 4.1.1 describes the Site with reference to land parcels. It has not been possible for us to view this plan as HDA5 in the LVIA describes Existing Visibility.
- 3.2 The text in 4.1.2 describes a *bespoke housing solution* but no details are provided to support this statement. The LVIA describes higher density housing within the existing developed parts of the campus and lower density on the more sensitive north western field. The height parameters plan (Figure 21) included in the Harwell Campus Framework Masterplan document (13th January 2016) shows development to a 9 metre roofline (2 storey) in the northern part of the allocation Site, increasing to 15 metres (up to 4 storeys) in the southern/central parts of the allocation Site. The north western field was not included in the original Framework Masterplan document. This strategy is partly consistent with text in Paragraph 5.1.1 of the LVIA, which states that 15 metre (4 storey dwellings) would be located in the central parts of the site, but with ridge heights up to 12 metres in the north and at the edges of the site (the Framework Masterplan shows 9 metre ridge heights in the northern part of the site). Existing residential development on site is 2 storeys with ridge heights estimated at 8 to 9 metres from the site visit.
- 3.3 The Landscape Strategy for the proposed development is described in Section 4.2 of the LVIA. This section references Plan HDA 6 Landscape Mitigation. At 4.2.2 HDA identifies the key issues and constraints (location within the AONB, sensitivity of 'green field' parts of the site, visual sensitivity of the Icknield and Ridgeway trails and references high quality landscape features within the site to be retained, but these are not identified). All of these are constraints which could have been identified from a desk top exercise and do not appear to be informed by the baseline landscape and visual assessments.
- 3.4 The Landscape Mitigation Plan (HDA 6) shows the retention of the tree belts on the north eastern, eastern and western site boundaries and the retention of a belt of woodland within the south western part of the Site. The planting of a narrow tree belt is shown on the northern boundary to the north western field. The Icknield Way is shown running through a green corridor within the Site.
- 3.5 No detail is provided as to the degree to which the massing of development within the Proposed Development Areas will be broken up by planting. Plan HDA6 shows a single large development area south of the Icknield Way, with no landscape corridor or green infrastructure (with the exception of the retained woodland and perimeter woodlands and

planting) and a smaller parcel to the west of the existing residential development in the north eastern part of the site. Plan HDA 4 (Site analysis) also identifies tree blocks and locations more sensitive to development in the northern part of the Site. None of these features (which it can reasonably be assumed are the more sensitive landscape elements within the campus described in the HDA baseline landscape assessment) are shown as retained.

4. Predicted Effects of Development

4.1 As described above, the LVIA does not include a more structured response to landscape character and visual impacts and effects as recommended in GLVIA3. It is accepted best practice that the assessment of effects on landscape character should assess effects at a geographical ie national and regional scale, by reference to the published LCAs, and then focus on the effects at a local and site specific scale (see extract from GLVIA3 Paragraph 5.50 included as Appendix 3). There is also limited assessment of the landscape effects of the proposed development on the AONB. The assessment of visual effects does not include an evaluation of the effects of development from each of the identified viewpoints, but provides an overview of anticipated effects from locations to the north, south east and west.

4.2 Landscape Effects

4.2.1 The existing campus and residential areas benefit from an extensive and mature tree structure (see LMS Views 3 and 4).

4.2.2 No information is provided as to the degree to which this open, mature wooded character will be retained. With a proposed development of 1,000 homes on a site of 36.78 hectares, which would result in housing densities of between 25 and 30 dwellings per hectare, it is inevitable that there will be a substantial loss of open land and tree removals.



LMS View 3: View of the northern part of the campus demonstrating to the level of tree cover and open space



LMS View 4: View of the northern part of the campus demonstrating to the level of tree cover and open space

4.2.3 HDA conclude that there will be a medium magnitude of change as a consequence of re-development in the short term, increasing to low beneficial as the landscape setting to the new development matures. There is little evidence to support this conclusion. Until proposals are developed to indicate the level of tree removals and loss of open space, the character, layout and density of development and the associated landscape and open space infrastructure, a judgement on whether this will be harmful or beneficial cannot be concluded. What is clear is that there will be a substantial loss of open land, much of which could reasonably be assessed as green field within the campus. As described above, this land lies within the AONB and whilst it cannot be argued that it strongly reflects defining characteristics of the natural beauty and scenic qualities of the AONB, it does nonetheless contribute to the open character of the AONB and currently provides an important wooded backdrop to the existing Harwell Campus in more distant views from the south, including the Ridgeway (see Visual Effects below). Whilst further detail would be required to develop overall conclusions as to the impact and effects of development of this scale on the allocation Site, the following effects can be concluded at this stage:

- There would be a substantial loss of tree cover and open land in the central and northern parts of the campus, including the north eastern field;
- Levels of traffic movements and traffic noise would increase and would therefore impact on the sense of tranquillity and character;
- The proposed development would include development up to 12 metres in height in the northern parts of the campus. The existing residential development is only an estimated 8 to 9 metres in height.

4.2.4 These are all judged as harmful effects. In the context of the campus, the HDA conclusion that there would be a medium magnitude of change and consequent moderate adverse effect is reasonable with regard to the existing developed areas. HDA in their baseline assessment conclude that some areas of the campus maybe judged of higher sensitivity. This appraisal concludes that the north western and north eastern fields and other more open, wooded areas of the campus should be judged of higher landscape sensitivity (the Icknield Way corridor is considered separately below). In these more sensitive parts of the campus, which it should be emphasised lie within the AONB, a medium magnitude of change would result in a substantial/moderate adverse landscape effect.

4.2.5 At 5.2.6 HDA state that there would be *no long-term harm to the character and appearance of the AONB as a result of the proposed site allocation and long-term mitigation strategy*. An initial moderate adverse effect is assessed by HDA with regard to the landscape of the AONB to the north (paragraph 5.2.5), decreasing to minor or neutral as planting matures. These judgements are largely based on a visual assessment ie the only perceived impact is from the north. This assessment does not properly assess the effects of development in particular on the north west field and other open or wooded parts of the campus in the north east and west which reflect characteristic features of the Downs Footslopes LCAs and the AONB. Development of the north west field would result in the loss of an open arable field which strongly reflects the character of this part of the AONB. HDA rightly assess that this field should be assessed as of very high sensitivity. The proposed development will result in a high magnitude of change. The effects on landscape character in the north west field and those parts of the AONB from which there is a strong physical and visual relationship (principally the land to the north) should be assessed as high with a consequent major or substantial adverse effect on landscape character. The fact that a belt of trees will be planted on the northern edge of the north west field would not diminish the level of effect of the development on the character and appearance of the AONB.

4.2.6 This assessment therefore concludes that there would be harm to the character and appearance of the AONB as a consequence of:

- The development of the north western field which strongly reflects the character and appearance of the AONB would result in a significant adverse effect on the landscape character and appearance of the AONB in this location;

- Development of the northern parts of the Site, in particular the north western field, would impact on the character and appearance of the AONB beyond the Site boundary (which includes the Icknield Way), principally to the north;
- The proposed development would result in the loss of open land and woodland/tree cover which will influence both the character of the land within the campus (which is within the AONB) and the wooded backdrop to the campus in views from the Ridgeway and other footpaths on the scarp slope (LMS Views 1 and 2). This includes the loss of land identified as *areas most sensitive to development due to their relationship with the wider AONB* and important *tree blocks* as shown on Plan HDA4;
- The proposals will introduce development up to 12 metres in height to the northern parts of campus and at a greater density to the existing development. It is possible that this higher development could be perceived from the east and north;
- There will be a substantial increase in traffic movements and noise associated with the 1,000 dwellings. This will result in increased traffic on local roads, affecting tranquillity both within the Site and the roads in the wider AONB.

4.2.7 There is no information or detail to support conclusions drawn by HDA that the proposed mitigation would result in beneficial effects to the character and appearance of the AONB. The existing development on this part of the campus is well screened and benefits from a strong open space and wooded infrastructure. The proposed development would introduce development across the whole of this part of the campus, at a greater density than the existing development and would reduce the level of tree cover and open space within the Site, although this may, in part, be compensated by a better designed landscape infrastructure. There is, however, no evidence to support the conclusion drawn by HDA in Paragraph 5.2.6 that this will result in *an improvement to baseline character*.

4.2.8 There is no assessment of the effects of development on the character and setting to the Icknield Way. This is considered principally in relation to views by HDA (see below). There will be little effect on the character and appearance of the Icknield Way to the east of the Site. Within the Site the Icknield Way runs through a wooded corridor with hedging and woodland trees beyond (see HDA Viewpoint 3). The less attractive parts of the route through the Site (HDA Viewpoints 4 and 5) are located on the temporary re-alignment of the Icknield Way to facilitate the de-contamination works and are not, therefore, representative of the character and appearance of the route of the Icknield Way within the Site. The existing residential development can be glimpsed on occasion above the hedge. Whilst the character and appearance of the Icknield Way through the Site does

contrast with the more open character of the route beyond the Site, it retains a semi rural wooded character and is not considered to be of a degraded appearance, and benefits from a strong landscape setting.

4.2.9 The proposed development would enclose the whole length of the Icknield Way through the eastern and central parts of the campus within development (as shown on the Landscape Mitigation Plan HDA6). Development south of the Icknield Way would be up to 15 metres in height and that to the north up to 12 metres in height, in contrast to the substantially lower existing buildings either side of the path. Development would also extend along the entire length of the path through this part of the campus, in contrast to the existing situation with built form largely limited to land adjacent to the route in the eastern most part of the Site. Assuming development was permitted to a similar distance from the path, this would have a harmful effect on the character and setting and public enjoyment of this section of the Icknield Way, due to the increased height, massing and extent of built development north and south of the route.

4.2.10 On the north west edge of the campus, the Icknield Way runs along the northern edge of the north western field. This section of the Icknield Way benefits from a strong rural character, with characteristic features and views as part of the AONB (see HDA Views 6 and 7 and LMS View 5 below).



LMS View 5: View north east along the Icknield Way showing the northern edge to the north west field and the undeveloped land in the north east field. The temporary structure is associated with the de-contamination site.

4.2.11 There would be a substantial change to both the setting and character of this section of the Icknield Way. The path currently runs through an open rural setting with views north and south. The southern edge to the path would form the northern limit of development and

there would be development in the north east land parcel. Whilst screening may in time partially reduce the visibility of development the perception of development would remain, and would strongly influence the character and appearance and, as a consequence, public enjoyment of this section of the Icknield Way. The sense of tranquillity would be affected due to the proximity of development and background noise associated with residential properties and traffic. In this location the Icknield Way is assessed as being a highly sensitive landscape receptor. The magnitude of change is assessed as high. This would result in a substantial adverse and, therefore, significant harmful effect on landscape character and appearance of this section of the Icknield Way and public enjoyment of the route.

4.3 Visual Effects

Land to the south: The Ridgeway and Downs Scarp

- 4.3.1 HDA concludes that there will be a very low magnitude of change and a consequent minor adverse decreasing to negligible effect in views from the Ridgeway. The North Wessex Downs AONB in their letter dated 22nd November accept that there would be *no significant adverse effects on the enjoyment of The Ridgeway National Trail*. These judgements are to a large degree based on the prominence of the existing campus and other built form which detract from the scenic beauty of this part of the AONB. Photomontages 2 and 3 of the HDA LVIA show the anticipated extent of the Site which would be perceived from the AONB. This Appraisal includes two other viewpoints from the lower slopes of the scarp (LMS Viewpoint 1) and from the Ridgeway (LMS Viewpoint 2). In all of these the importance of the allocation site as part of the wooded backdrop to the main Campus is evident. As identified by the AONB in their letter of 22nd November 2017, assessment of *landscape and visual effects of the proposal is hampered by the lack of clarity over exactly what kind of housing development might be proposed across the allocation area*. The Landscape Mitigation Plan (HDA6) does not suggest that substantial areas of woodland cover will be retained within the development parcels. Depending on the level of tree removals and the density of development there is a strong possibility that the proposed development would be visible beyond the campus buildings and much of the wooded backdrop would be lost. This would have the effect of substantially increasing the massing of built development across the campus, extending to the allocation site. The existing development on the allocation site is currently screened by the existing woodland.
- 4.3.2 Although it is accepted that firm conclusions cannot be drawn on this point (due to the lack of detail relating to the proposed development), there is the potential for a greater

magnitude of change and more substantial harm in these highly sensitive views from the Ridgeway.

Land to the east: Ickniel Way and other Public Rights of Way

- 4.3.3 The existing built form on the campus is largely screened by the existing trees on the eastern site boundary, although development can be glimpsed above the trees from some locations (see LMS Viewpoint 6 below).



LMS View 6 (similar to HDA 11): View west showing the eastern site boundary from the Ickniel Way. Built form can be glimpsed above the existing trees

- 4.3.4 As described in the baseline assessment above, the existing visibility of the Site is far greater than suggested in the HDA baseline visual assessment (see Appendix 2). Development in the eastern and north eastern parts of the site could potentially be glimpsed above the trees (in particular any 12 metre units), but this would only be a minor change to the existing view. Impacts and effects are therefore assessed as minor adverse to negligible.

Land to the north: Principally A4185 Hungerford Road

- 4.3.5 Photomontage 1 illustrates the anticipated visibility of the proposed development in views south from the A4185. Development of the north western field would be highly prominent in these views from land within the AONB. Built form is not a feature of the existing view and the proposed development would be set against the backdrop of the Downs scarp. Development would interrupt this open rural view, characteristic of this part of the AONB. Development would also impact on views south from Footpath FP 243/17/10, in particular in the vicinity of the Bield and would be glimpsed from Footpath FP 199/16/20, to the north west (see Plans in Appendix 2). All of these are views from open countryside within the AONB and are characteristic views towards the downland scarp. Whilst there is an

argument that visual receptors on a road are less sensitive than users of rights of way, this view is open to the thousands of daily road users and the magnitude of change in these views from the north should be assessed as high, with a consequent substantial/moderate or moderate adverse effect. Planting on the northern boundary to the north west field would not conceal the development. Development would remain prominent and would not form *a small part of the wider view* nor would the change to the view be *consistent with existing views of the campus*, as suggested by HDA in paragraph 5.3.3. HDA suggest that development would not *conceal any of the rural landscape experienced from these viewpoints*. Photomontage 1 clearly demonstrates that this is not the case.

Land to the west: Icknield Way and other PRow

4.3.6 The Icknield Way to the west of the campus runs through open countryside, characteristic of the AONB and there are open views to the north, with more enclosed views west, south and east along the path into the proposed allocation site. In these locations the Icknield Way should be assessed as of the highest visual sensitivity. There will be a medium to high magnitude of change to these views as a consequence of the scale and extent of development and the proximity of the development to the viewer (east see HDA 8 and LMS 6, west see HDA 7 and south as illustrated in all of these panoramic views). The proposed development on both the north west field and in the north eastern parts of the Site would be a prominent feature in these views. It cannot be argued that screen planting would result in improvement or enhancement to the setting and views from this part of the Icknield Way, which currently benefits from open, rural views. It is unlikely that planting would completely screen the proposed development in particular in winter months and the assessment of residual effects should balance any benefits associated with the planting against the acknowledged adverse effects of the development. For these reasons the level of visual effects is concluded as being substantial adverse and therefore significant for this part of the Icknield Way. It cannot be concluded that there would be *no changes to the views experienced from the Icknield Way beyond the extents of the site* as stated by HDA at Paragraph 5.3.2.

4.3.7 There would also be a perception of development for users of Footpath 199/16/20 on the western boundary. There is relatively dense existing vegetation on this boundary, but it is concluded that the proposed development would be glimpsed through breaks in the vegetation, but this is not assessed as being of particular significance.

Within the Site: Icknield Way

- 4.3.8 As discussed in the baseline and landscape effects sections of this Appraisal, the Icknield Way runs through a broad, wooded, semi rural corridor within the site. There are glimpsed views of the existing residential areas but these are mainly confined to the eastern sections of the corridor. The diversion around the de-contamination site has a very different character. The proposed development would extend built form along the entire length of the Icknield Way within the site, with building heights increased to up to 12 metres to the north and 15 metres to the south. Tree planting would be unlikely to screen the proposed development and would also alter the character and appearance of the route through the campus. This assessment concludes that there would be visual impacts to users of the Icknield Way within the site due to the increased extent and height of development bordering the path. Although difficult to assess, due to the lack of detail available relating to the proposed development, the magnitude of change is considered likely to be medium, due to the height and extent of the anticipated development, with a consequent substantial/moderate level of visual effects. The proposed development would detract from the experience of users of the Icknield Way and views from the path within the site.

5. Conclusions

- 5.1 This appraisal concludes that there would be harm to the landscape character and scenic beauty of the North Wessex Downs AONB as a consequence of the proposed site allocation of 1,000 homes on land at Harwell Campus. The degree of landscape and visual harm to the landscape character of the AONB does vary across the Site but is considered of particular significance in relation to the development of the north west field, which retains a character and appearance which strongly reflects that of the AONB. The character and setting to the Icknield Way would also be significantly affected and, as a consequence public enjoyment for users, in particular in its central and western sections across the campus.
- 5.2 There would be significant adverse visual effects in views from the north towards the Site, as demonstrated in HDA Photomontage 1. There would also be significant adverse visual effects to views from the Icknield Way, in particular, in the vicinity of the north west field. It is not possible to draw firm conclusions as to the extent of tree removals which would affect the level of visibility of the proposed development in views from the Ridgeway. There is some conflict in the assessment of this issue by HDA. Plan HDA 4 identifies parts of the site more sensitive to development and tree blocks. Text within the LVIA suggests that efforts will be made to retain such features. Plan HDA 6 (Landscape Mitigation) only shows a belt of woodland in the southern part of the site and perimeter woodland as retained. All of these locations lie within the AONB and it is therefore concluded that development would result in harm to characteristic views within the AONB.
- 5.3 The HDA LVIA presents a comprehensive methodology which largely accords with best practice guidance set out in GLVIA3. There is, however, limited evidence within the main body of the LVIA of the application of this approach to assessment of landscape character, by reference to the published LCAs, landscape value and sensitivity and susceptibility to change. The plan showing Existing Visibility (HDA 5) understates the visibility of the allocation Site in views from the north, east and to a more limited degree the south and west. The existing site boundary vegetation constitutes part of the Site and if this is visible this cannot be assessed as 'No View' (see Appendix 2). There is very limited information supplied on the nature of the proposed development. With such limited information conclusions that existing vegetation will screen development, and provide residual benefits, cannot be drawn at this stage.

5.4 The conclusions to this appraisal therefore differ from those drawn in the HDA LVIA on the following key points:

- There will be harm to the natural beauty and scenic qualities of the North Wessex Downs AONB;
- There will be harm to the character and setting to the Icknield Way and, as a consequence public enjoyment of the route;
- There will be significant visual harm to views from the north and west of the allocation Site, from locations within the AONB (as demonstrated in HDA Photomontage 1) and on the Icknield Way;
- Development on the scale proposed is likely to result in extensive tree removal and a loss of the open character of the existing campus, all of which lies within the AONB;
- Conclusions drawn by HDA as to the residual benefits of landscape infrastructure and planting are premature (due to the lack of detail at this stage) and also largely ignore the harm which will result as a consequence of the development itself.

Appendix 1: LMS Additional Viewpoints

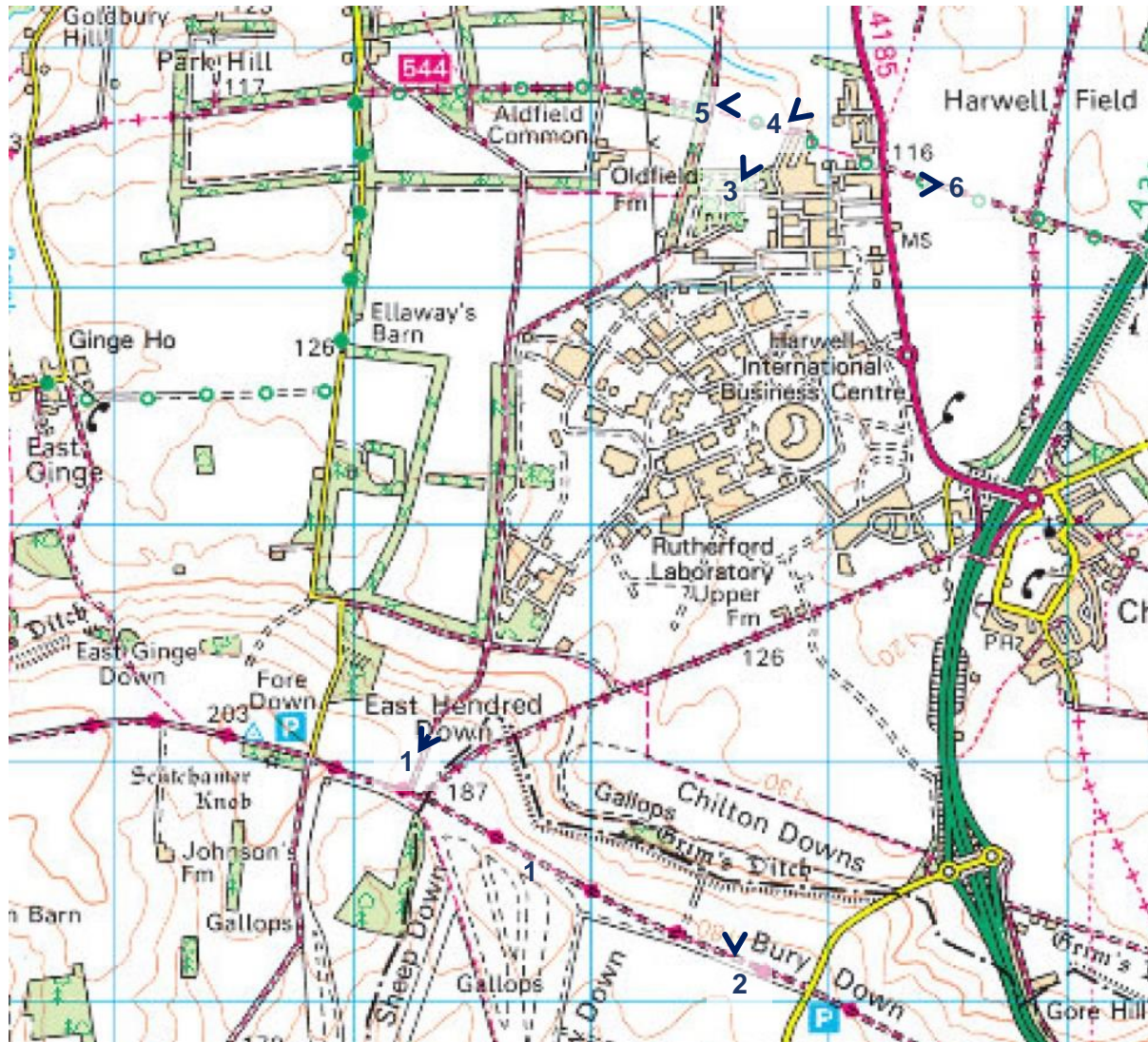


Figure 2: LMS Additional Viewpoints



LMS View 1: View towards the campus from PRoW 199/23/40. LMS View 2: View towards the campus from the Ridgeway, west of Bury Road. The allocation site forms an important part of the wooded backdrop to Harwell Campus in this view



LMS View 2: View towards the campus from the Ridgeway, west of Bury Road. The allocation site forms an important part of the wooded backdrop to Harwell Campus in this view



LMS View 3: View of the northern part of the campus demonstrating to the level of tree cover and open space



LMS View 4: View of the northern part of the campus demonstrating to the level of tree cover and open space



LMS View 5: View north west along the Icknield Way showing the northern edge to the north west field and the undeveloped land in the north east field. The temporary structure is associated with the de-contamination site.



LMS View 6 (similar to HDA 11): View showing the eastern site boundary from the Icknield Way. Built form can be glimpsed above the existing trees

Appendix 2: Comparative Assessment of External Visibility based on Plan HDA 5

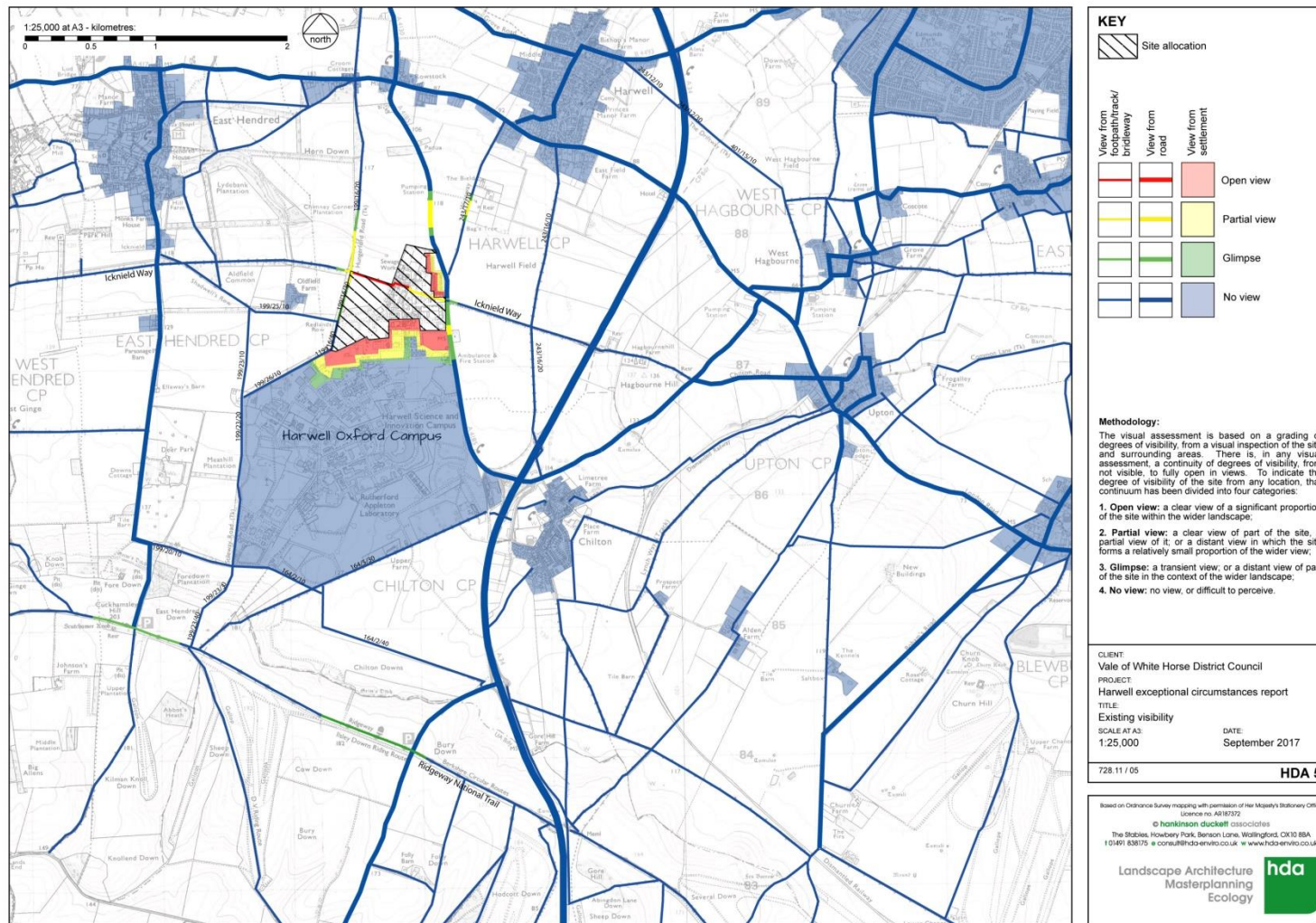


Figure 3A: Plan HDA 5: External Visibility

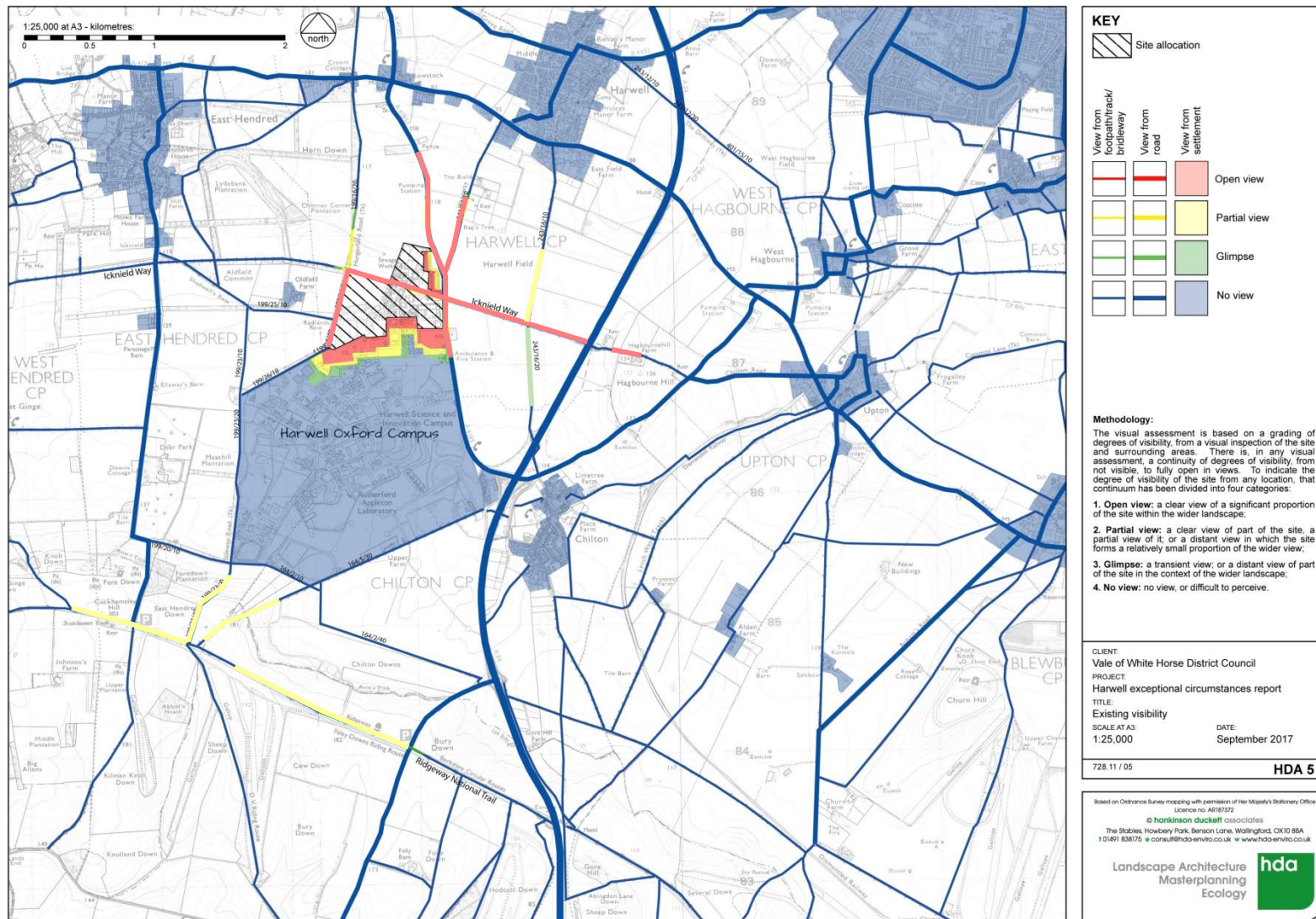


Figure 3B: Plan HDA 5 with LMS amendments

Appendix 3: Paragraph 5.50 from GLVIA3

5 Assessment of landscape effects

- whether the effect changes the key characteristics of the landscape, which are critical to its distinctive character.

Geographical extent

The geographical area over which the landscape effects will be felt must also be considered. This is distinct from the size or scale of the effect – there may for example be moderate loss of landscape elements over a large geographical area, or a major addition affecting a very localised area. The extent of the effects will vary widely depending on the nature of the proposal and there can be no hard and fast rules about what categories to use. In general effects may have an influence at the following scales, although this will vary according to the nature of the project and not all may be relevant on every occasion:

5.50

- at the **site** level, within the development site itself;
- at the level of the **immediate setting** of the site;
- at the scale of the **landscape type or character area** within which the proposal lies;
- on a **larger scale**, influencing several landscape types or character areas.

Duration and reversibility of the landscape effects

These are separate but linked considerations. Duration can usually be simply judged on a scale such as short term, medium term or long term, where, for example, short term might be zero to five years, medium term five to ten years and long term ten to twenty-five years. There is no fixed rule on these definitions and so in each case it must be made clear how the categories are defined and the reasons for this.

5.51

Reversibility is a judgement about the prospects and the practicality of the particular effect being reversed in, for example, a generation. This can be a very important issue – for example, while some forms of development, like housing, can be considered permanent, others, such as wind energy developments, are often argued to be reversible since they have a limited life and could eventually be removed and/or the land reinstated. Mineral workings, for example, may be partially reversible in that the landscape can be restored to something similar to, but not the same as, the original. If duration is included in an assessment of the effects, the assumptions behind the judgement must be made clear. Duration and reversibility can sometimes usefully be considered together, so that a temporary or partially reversible effect is linked to definition of how long that effect will last.

5.52

Judging the overall significance of landscape effects

To draw final conclusions about significance, the separate judgements about the sensitivity of the landscape receptors and the magnitude of the landscape effects need to be combined to allow a final judgement to be made about whether each effect is significant or not, as required by the Regulations, following the principles set out in Chapter 3. The rationale for the overall judgement must be clear, demonstrating how the assessments of sensitivity and magnitude have been linked in determining the overall significance of each effect.

5.53

Significance can only be defined in relation to each development and its specific location. It is for each assessment to determine how the judgements about the landscape receptors and landscape effects should be combined to arrive at significance and to

5.54