

## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dair and Vicki Farrar-Hockley
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Consultation Point	1.28 Paragraph ( <a href="#">View</a> )
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Q1 Do you consider the Local Plan is Legally Compliant?	No
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within a core policy please select this from the drop down list.	N/A

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

**THE SUSTAINABILITY APPRAISAL.** An objection is made to the Sustainability Appraisal on the basis that the proposed alternation strategy is not demonstrated to be the most appropriate compared to the alternatives, as required by national policy. The Sustainability Appraisal determined the choice of the preferred option, and hence it is necessary to object to the Sustainability Appraisal to justify proposed amendments to the Local Plan. The Sustainability Appraisal considered a range of options from Option A for 13,000 dwellings, originally supported by the Council as their preferred option, to Option G, for 21,000 dwellings. The Sustainability criteria makes clear that the increased housing in Option G will have significant environmental effects and the effects of generating significantly more travel by car. It states that these environmental effects can be dealt with by detailed design and development management policies. There would appear to be greater impacts on Environmental Criteria 3,7, 8,

9,10 and 11 in the preferred option G, than the lower level of housing in Option A. Many of the impacts are considered to require monitoring. Clarification is sought as to whether even with monitoring the preferred Option G can be demonstrated to have less negative impacts than Option A. Clarification is sought as to how the proposed mitigating measures will result in no significant environmental effects on villages of up to 500 dwellings in a rural area from an additional 8,000 dwellings, and how there would be no greater impact than the originally preferred option of 13,000 dwellings. A significant environmental effect of the increase in dwellings in Option G is the need to housing allocations in the AONB, which would not be necessary under Option A. The sustainability appraisal does not take sufficient account of the additional dwellings in Option G not being located at existing Towns, where the most jobs, shops and services are located. Option G is therefore a less sustainable form of development. The basis of the choice of Option G for 21,000 dwellings was the recommendation of the SHMAA, which has not been tested against past trends, or whether the proposals are realistic. The SHMAA recommendations were based on the Oxford Growth Board's proposals for 219 hectares of new employment land which has not been backed by robust evidence or tested at a public inquiry. The Oxford Growth Board's employment proposals were prepared without sufficient assessment of their implications on new housing and infrastructure or the environment. For example at Harwell Campus all of the five sites considered for additional housing are considered to have a High/Medium Landscape Impact Value, subject to objections from Natural England, and the North Wessex Downs AONB Board. Clarification is sought as to whether in paragraph 13.3 the Sustainability Appraisal considered the option of no new housing allocations in the AONB at Harwell Campus. Given that Option A for 13,000 dwellings was an original preferred option of the Council, there was an alternative to new housing allocations in the AONB, and hence exceptional circumstances do not exist to justify large scale development in the AONB, as required by national planning policies. The sustainability appraisal considered a range of 143 -173 hectares of employment land. The proposed 219 hectares of employment does not seem to be within the range tested. Now that the benefits of the Enterprise Zone will terminate in March 2015, consideration should have been given as to the lower rate of new jobs than has been achieved with the benefits. Otherwise it is difficult to justify why the benefits were originally approved. Clarification is sought on how many jobs could be achieved at Didcot Power Station instead of at Harwell Campus, given it is a more sustainable location.