

Comment

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| Consultee | Mrs Teresa Griffiths (871400) |
| Email Address |  |
| Address | High Corner Main Street Chilton OX11 0RZ |
| Event Name | Vale of White Horse Local Plan 2031 Part O |
| Comment by | Mrs Teresa Griffiths |
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Q1 Do you consider the Local Plan is Legally Compliant? Yes

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

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as local authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? Yes

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

Paragraph 6.111: ?The conservation of the intrinsic character and beauty of the countryside is a core planning principle. The planning system should contribute to and enhance the natural and local environment by protecting and enhancing it.

Rather than striving to protect and enhance valued landscapes, the VWHDC have allocated the largest strategic housing allocation in the country to a National Park or AONB in the whole UK. The single allocation of 850 houses within the North Wessex Downs AONB is a national scale. However, the VWHDC have allocated a further 550 houses to the North Harwell Campus bringing the total number of houses within the North Wessex Downs AONB to 1,400. As such, the VWHDC have been neglecting their legal responsibilities under the NPPF.

and 116, the CROW Act 2000 Section 85, and the North Wessex Downs AONB's statutory Management Plan 2009-2014. Key Issues affecting the North Wessex Downs AONB: ? Expansion of the main urban areas just outside the boundaries of the AONB. ? Pressures on the boundaries of the AONB. ? New large free-standing houses as replacement dwellings in open countryside. ? Diversification activities and associated signage. ? Unsympathetic incremental expansion of the settlements of and around the AONB from the surrounding countryside. ? Potential for major development to intrude onto open downland, including major developments, and mineral extraction and waste management, threatening the senses of remoteness and tranquillity. ? ?brown field? sites within the AONB, especially redundant airfields and military sites (as at Wroughton), and the increasing pressure for new developments at junctions of the M4 and A34. ? Lack of knowledge about the boundaries of the AONB. ? Dark night skies within the AONB and the implications of light spillage from development in and around the AONB. ? Introduction to the AONB's statutory Management Plan 2009-2014 that the Local Authority, the Vale of White Horse District Council, of. The original capacity assessment of the Harwell East Campus, summarised in Appendix 11 of the URS SA report of 2009. ? SA 8: The landscape study recommends that the site has low landscape capacity and no part of the site is suitable for development located within the AONB and there is also one Listed Building along the boundary of the site. Core Policies 34 (Landscape) and 35 (Historic Environment) would apply; however, such a scale of development within the AONB and surrounding a Listed Building would have significant negative effects in terms of the landscape and historic environment. ? Despite this, the VWHDC still proceeds with housing allocation in the North Wessex Downs AONB.

The VWHDC then appointed Hankinson Duckett Associates to undertake a landscape and visual appraisal of the land surrounding Harwell Oxfordshire (Plan HDA 1, September 2014). This report assesses the relative capacity of parcels of land surrounding Harwell for future residential development. In light of this document, the Vale of White Horse District Council states: ? AONB/Altitude sensitivities of these sites a Landscape and Visual Impact Assessment (LVIA) has been prepared to inform the development of land surrounding Harwell Campus to accommodate future residential development the Council commissioned a Landscape and Visual Impact Assessment (LVIA) for all land parcels around the campus in order to inform the option testing, the optimum level of growth at the site that could be achieved without leading to significant negative effects on the AONB, the likely effectiveness of mitigation measures, proposing a mitigation strategy and identifying the residual landscape impacts. If the measures had been applied the SA assessed the more detailed options for development around Harwell Campus and the scale of development proposed in the AONB has been significantly reduced. ? (SOURCE: http://whitehorsedc.moderngov.co.uk/documents/s24349/14_10_06_VoWH%20Local%20Plan%20Part%201%20Consultation%20Report) However, the VWHDC is misleading the public by stating that the ?proposed development in the AONB has been significantly reduced? were allocated to the Harwell East Campus in the Local Plan Part 1 in February 2014, and the updated version still allocates housing to the North Wessex Downs AONB to the Harwell Oxford Campus albeit split between two sites on opposite sides of the AONB. It is hard to believe that the unprecedented building of 1,400 homes at a single strategic geographical site in the AONB will have no negative effects? on the AONB as stated above. The scale of development alone will lead to adverse effects in terms of tranquillity and remoteness of the AONB, and will further be out of character with the other settlements within the AONB and adversely change the character of Chilton village. The LVIA carried out by Hankinson Duckett Associates also fails to consider the cumulative impact of the proposed developments at the East Harwell Campus, the North Harwell Campus with the full development of itself in terms of environmental impact and the coalescence of the resulting settlement with Chilton. The VWHDC does not consider these cumulative impacts and the resulting significant adverse effects on the tranquillity and remoteness of the AONB area either, as required by the following legislation: Directive 85/337/EEC, as amended by Directive 97/11/EC, requiring the assessment of indirect, secondary and cumulative impacts of a project. The EIA Directive also requires consideration of the interaction of environmental impacts. Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2009 also requires a description of the likely significant effects of a development which specifically includes the assessment of the total cumulative impact of this combined ?settlement? on the AONB has been ignored by the VWHDC and thus does not consider the degree of urbanisation that will result from their proposals. The sheer scale of the combined housing and employment opportunities will have significant negative effects on the sensitive AONB.

More interestingly, the Internal Appraisal of the Harwell Oxford Campus site after the conclusion of the Hankinson Duckett Associates concludes the following (SOURCE: URS Strategic Analysis of the Vale of white Horse Local Plan 2031, Appendix 14). The sites were sub-divided into land parcels A, B, C, D, E, F, G and H. Highlights from the discussion of ?significant effects? criteria are quoted below: ? ?SA 2: The four options allocate housing and not services or facilities. However, increased spending power resulting from the options would benefit local businesses and potentially encourage new economic activity in the district. A lower growth approach at Harwell Oxford Campus were pursued this could have the benefit of allowing development in the district. A wider distribution of growth (and spending power) could be assumed to support services and facilities in those areas in the west of the district ? more than by focussing growth at Harwell Oxford Campus. ? ? ?SA 3: All four options are well-served in terms of public transport and will benefit from transport improvements through the Science Vale Transport Strategy which directly contribute towards their funding and would help improve public transport in the south east district. Furthermore, the options provide access to employment opportunities at Harwell Oxford Campus which should help encourage walking and cycling to work. Employment opportunities are reasonably nearby too in the Science Vale Enterprise Zone. The four options would all lead to positive effects on employment opportunities; however the scale of development would likely lead to an increase in traffic on local roads. Residents in new housing areas at Harwell Oxford Campus would access employment opportunities further afield. The

traffic on the A34 which is already known to be congested and operating over its designed capacity in peak periods. High-growth approach at Harwell Oxford Campus would reduce the amount of development in the remainder of the district. Development at Harwell Oxford Campus would require development elsewhere across the district to meet housing targets. One of the benefits of a wider distribution of growth (and spending power) could be more beneficial in supporting the rural areas more particularly in the rural west of the district. SA 8: In terms of individual parcels, the Landscape and Visual Impact (LVIA) study at Harwell Oxford Campus states that there is no effective mitigation possible for parcels E and F and that they would lead to significant adverse effects on the AONB. Parcels A, B and G are the parcels that are most capable of being mitigated. SA 9: The scale of development at Harwell Oxford Campus would generate additional vehicle movements which could lead to potential noise and air impacts locally. The site is in a sensitive area and could have significant effects in terms of tranquillity of the AONB. Parcel B is near the A34 which may act in combination with the other parcels. The LVIA states that this is capable of being mitigated if retained as open space. Parcels E and F are not capable of being mitigated and have the potential to increase light pollution in the AONB. If it can be assumed that a greater scale of development at Harwell Oxford Campus would have an effect in terms of air, noise and light pollution in the AONB, Option A would be the best performing due to lowest growth and highest tranquillity in AONB. SA 11: The options are all located on greenfield grade 2 agricultural land which is classified as Grade 2 Agricultural Land. The Option leading to the least loss of Grade 2 land is Option A and can be said to be the best performing in terms of agricultural land.

Rather than advocate building such large numbers of houses within the North Wessex Downs AONB, the URS Interim Strategic Assessment for Oxford Sites suggests that a lower housing growth should be attributed to the Harwell Oxford Campus so that economic growth is encouraged across the Western Vale, and would be more beneficial in supporting the rural areas. Given the scale of development at the corner of the south east vale, up to 22,250 dwellings, there is no exceptional need to build a further 1,400 homes in the North Wessex Downs AONB as required by the NPPF paragraph 116. (In addition to the 10,320 houses currently allocated to the South East Oxford Campus, 1,400 houses are currently being built within the Vale at Great Western Park, Didcot. South Oxfordshire District Council has allocated 1,400 houses to the Didcot area on the basis of speculative job creation within the Science Vale. This brings the housing provision for the Science Vale to 10,320 + 3,300 + 2,330 = 15,950 dwellings. South Oxfordshire District Council are allocating up to a further 1,400 houses in the area in order to support the Science Vale. This would bring the total number of dwellings up to 15,950 + 3,540 = 19,490 dwellings. 275 houses have just been completed at Chilton, an additional 200 houses are being built at Harwell, and there is provision for a further 125 homes to the north of the Harwell Oxford Campus (these housing allocations are not shown in the maps of Chilton and Harwell Oxford Campus in the Local Plan). Taking these into account, the total dwellings allocated to supporting the science vale is 15,950 + 125 = 20,075 houses.) In addition, the current Chilton demographic indicates that only approximately 12% of Chilton residents are currently working in the Harwell Oxford Campus (SOURCE: Petition against 1,400 homes in the North Wessex Downs AONB handed in to the Feb 2014 consultation period.), and the URS Strategic Assessment Report, Appendices, Appendix 14, SA3 recommends that residents in new housing areas at Harwell Oxford Campus would access employment opportunities further afield. The URS Strategic Assessment recommended that traffic on the A34 which is already known to be congested and operating over its designed capacity in peak periods should be reduced. In a report recommended May 2014 that a proposed Sussex neighbourhood plan should not proceed to a referendum: http://www.planningportal.gov.uk/general/news/stories/2014/Jan14/300114/300114_3 and http://www.midsussex.gov.uk/news/2014/01/14/300114_3 and the fact that three site allocations for housing development fell within the High Weald Area of Outstanding Natural Beauty, it is not necessarily deliverable, according to the examiner. They had not been sufficiently justified given the great weight given to the SHMA Framework attached to the protection of landscape and scenic beauty." As a result, the Local Plan is unsound.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound in your view. You have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound in your view if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to make the Local Plan sound and legally compliant, the following modifications are necessary: Remove 1,400 homes from the Harwell East Campus. Remove the additional allocation of 150 homes from the North West Harwell Campus (reducing the number of houses from 550 to 400 (including the 125 already given outline permission)). Include provision of up to 1,200 homes in the West Harwell Campus (including the 125 already given outline permission), provided that all development is contained within the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus. Reallocate the 850 homes from the Harwell Oxford Campus to other sites already identified in the SHMA. For example: (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes), (b) Land West of Steventon (capacity for 425 houses), or (c) Land West of Steventon (capacity for 350 houses), or (d) Distributed throughout the West Oxford Campus. Or reduce the total SHMA allocation for the North Wessex Downs AONB entirely from the Science Vale Ringfence in order to protect it from future speculative development. The Science Vale fall behind in delivery of its housing targets.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to make your representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues for examination.

Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? No - I do not wish to participate at the oral examination.