

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mrs Teresa Griffiths
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Consultation Point	Core Policy 5: Housing Supply Ring-Fence (View)
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Submission Type	Email
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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 neighbouring planning 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 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.

Paragraph 4.17 states that the 'Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment' by SQW and Cambridge Econometrics February

2014 indicates that around 15,850, or ~70%, of the 23,000 new jobs forecast for the district to 2031 are likely to be located in the Science Vale Area. To clarify, this means that the Vale expect up to 15,850 new jobs to be created within the South East Vale covering the area from Wantage and Grove in the West to the outskirts of Didcot in the East, and from Sutton Courtenay in the North to Chilton in the South.

In the 'Further Justification' for building at the Harwell Oxford Campus is the statement 'It is estimated that at least 5,400 net additional jobs will be created at the campus.' (SOURCE: URS SA Report Final Paragraph 13.3.5).

The aforementioned document by SQW/Cambridge Econometrics clearly states, in relation to the UK Science Vale Enterprise Zone, that: 'In total therefore, we estimate that the increase in jobs above trend could be as follows: 5,400 net at Harwell and Milton Park, primarily in the Enterprise Zone (EZ) but also on other land at Harwell'.

Cambridge Econometrics then clarifies that the split between the Harwell Oxford Campus and Milton Park would mean that up to 3,500 net jobs could be created at the Harwell Oxford Campus in the time period to 2031.

However, it is important to distinguish between the total number of jobs at an employment site, and the net number of new jobs that are expected to be created. A further net 5,400 figure for the Harwell Oxford Campus is quoted by the SQW/Cambridge Econometrics Report, but only in so far as it states that 'There is scope for considerable further development at Harwell beyond the EZ' (SOURCE: Cambridge Econometrics Report, page 19 and Table 4.1). Therefore the land at Harwell Oxford Campus, including the land outside the EZ, has the potential capacity to accommodate up to net 5,400 new jobs.

The projected job figures appear to come from a simple area of land divided by the land required per employee calculation at a jobs/floor space density of 24 (SOURCE: SQW/ Cambridge Econometrics, Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment, February 2014, Table K.4: Employment sites and jobs in Vale of White Horse, page 117).

Therefore, the net 5,400 number for the Harwell Oxford Campus actually represents a job capacity for the site, not the projected number of new jobs. The Harwell-Oxford Campus has never pursued a policy of speculative development so any housing development should be under their control if it is to match employment growth. The SQW/ Cambridge Econometrics report still concludes that 3,500 net new jobs have the potential to be created at the Harwell Oxford Campus in the time period to 2031. As a result, the further justification for building at the Harwell Oxford Campus citing that at least 5,400 net new jobs will be created at the Harwell Oxford Campus is misleading; it either means 5,400 net new jobs across the Harwell Oxford Campus and Milton Park OR 3,500 net new jobs at the Harwell Oxford Campus. The growth plans for the Science Vale are ambitious: 'the Science Vale's ambitious growth plans' (SOURCE: <http://www.whitehorsedc.gov.uk/news/2014/2014-03/incentive-boost-science-vale-oxford>)

Indeed, even the VWHDC admit that the growth plans for the Science Vale are ambitious; 'There is an ambitious programme of job creation and growth for the Science Vale area' (SOURCE: Local Plan 2031 Part 1 Strategic Sites and Policies Publication Version November 2014, paragraph 5.68) The SQW/Cambridge Econometrics report also states that 'There has been almost no supply of business space on a speculative basis, even in the Science Vale Enterprise Zone'. To date the Harwell-Oxford campus has never provided speculative space.

Therefore, the statement of 'at least 5,400 jobs' being created at the Harwell Oxford Campus is misleading, unjustified and therefore unsound. There is little evidence of Consultation with the Harwell-Oxford Campus and a current strategy for the Campus has not been published.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful 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, and protect the North Wessex Downs AONB, the following modifications are necessary:

- 1 Remove the entire allocation of 850 homes from the Harwell East Campus.
 - 2 Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of houses from 550 to 400 including the 125 already given outline permission)).
 - 3 Include provision of up to 400 new homes (including the 125 already given outline permission) at the North West Harwell Campus, provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
 - 4 Reallocate the 850 homes from the Harwell East Campus and the additional 150 houses from the North West Harwell Campus (1,000 houses in total) to other sites already identified by the Vale of White Horse, for example:
 - ? (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
 - ? (b) Didcot A (capacity for 425 houses), or
 - ? (c) Land West of Steventon (capacity for 350 houses), or
 - ? (d) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district.
- 1 Or reduce the total SHMA allocation for the District by 1000
 - 2 Remove the North Wessex Downs AONB entirely from the Science Vale ?Ringfence? in order to protect it from future speculative development should the Science Vale fall behind in delivery of its housing targets.

Only by implementing these steps in full will the Local Plan be compliant with the NPPF paragraphs 115, 116 and the CROW Act 2000.

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

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies 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