

## Comment

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<b>Comment by</b>	Mr Timothy Kapp
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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 4.19 states that the majority of the VWHDCs strategic housing growth is allocated in the South East Vale, with a significant proportion of that in the south east corner to the South East Vale. This is predominantly to support economic growth and job creation in the Science Vale.

Core Policy 4 details where in the South East Vale 10,320 dwellings are located, including 1,400 in the North Wessex Downs AONB.

In addition to the 10,320 houses currently allocated to the South East Vale by the VWHDC, 3,300 houses are currently being built within the Vale at Great Western Park, Didcot. South Oxfordshire District Council has further allocated 2,330 houses to Didcot area on the basis of speculative job creation within the Science Vale. This brings the housing provision for supporting the Science Vale to  $10,320 + 3,300 + 2,300 = 15,950$  dwellings.

However, the Science Vale sites at the Unitary Boundary between the Vale of White Horse and South Oxfordshire, and South Oxfordshire District Council are allocating up to a further 3,540 houses to the Didcot area in order to support the "science vale" (option B - issues and scope). This would bring the total number of dwellings up to  $15,950 + 3,540 = 19,490$  homes. Furthermore, 275 houses have just been completed at Chilton, an additional 200 houses are being built at Harwell, and there is outline planning permission for another 125 homes to the north of the Harwell Oxford Campus (these housing allocations are not shown in the maps of Chilton and the Harwell Oxford Campus in the Local Plan). Taking these into account, the total dwellings allocated to supporting the Science Vale is actually,  $19,490 + 275 + 200 + 125 = 20,090$  houses.

With the Science Vale ambitiously speculating to create up to 16,000 jobs, then it would appear that with up to 20,090 houses being built in the general area, that there is more than an adequate provision of housing to support the predicted economic growth.

As a direct result of this, it would seem reasonable to remove 1,000 of the 1,400 houses allocated to the North Wessex Downs AONB and relocate them elsewhere, without it being detrimental to the economic growth plans of the Science Vale.

This strategy is given further weight by the following quotes from the appendices to the report by URS on the "Strategic Assessment of the Vale of White Horse Local Plan 2031 Part 1: Appendices" which state that:

"A low growth approach at Harwell Oxford Campus would require development elsewhere across the district to meet housing targets. On the basis it could be argued that a wider distribution of growth (and spending power) could be more beneficial in supporting the rural areas more - particularly those areas in the rural west of the district" (source: URS SA report, appendices, Appendix 14, SA 6) and

"There is a likelihood that residents in new housing areas at Harwell Oxford Campus would access employment opportunities further afield. This has the potential to increase traffic on the A34 which is already known to be congested and operating over its designed capacity in peak periods" (source: URS SA report, Appendices, Appendix 14, SA3).

Hence, the headline strategic of allocating 10,320 dwellings to the "science vale" area is misleading when in fact up to 20,090 houses are being built or have been allocated at the area in total, including around Didcot. As a result, housing provision within the Science Vale is significant. Therefore, the decision to continue to use the Science Vale as justification for large strategic housing sites in the South East Vale, and in particular to allocate an unprecedented 1,400 houses to mainly greenfield sites within the North Wessex Downs AONB, is unsound.

Note there is uncertainty and contradiction in the plan on housing numbers and this alone makes the plan unsound.

**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:

\* Remove the entire allocation of 850 homes from the Harwell East Campus

\* Remove the additional allocation of 150 homes from the North West Harwell Campus (e.g. reduce the number of houses from 550 to 400 including the 125 already given outline permission).

\* 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, provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus \* 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) Rowstock (capacity for 515 houses), or

d) Land West of Steventon (capacity for 350 houses), or

e) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district. \* Or reduce the total SHMA allocation for the district by 1,000

\* Remove the North Wessex Downs AONB entirely from the Science Vale "ring fence" 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 with the Local Plan be compliant with the NPPF paragraphs 115, 116 and 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