

Comment

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Comment by	Mr Ian Page
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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 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 to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 4.18 states that the majority of the VWHDCs strategic housing growth is allocated in the South East Vale, proportion of that in the south east corner of the South East Vale. This is predominantly to support economic growth in the Science Vale. Core Policy 4 details where in the South East Vale 10,320 dwellings are located, including 1,400 at Wessex Downs AONB. In addition to the 10,320 houses currently allocated to the South East Vale by the VWHDC, 15,950 are currently being built within the Vale at Great Western Park, Didcot. South Oxfordshire District Council has further allocated 15,950 houses to the Didcot area on the basis of speculative job creation within the Science Vale. This brings the housing growth supporting the Science Vale to $10,320 + 3,300 + 2,330 = 15,950$ dwellings. However, the Science Vale sits at the U

between the Vale of White Horse and South Oxfordshire (SO), and South Oxfordshire District Council are allocating 3,540 houses to the Didcot area in order to support the 'Science Vale' (Option B: http://www.southoxon.gov.uk/sites/default/files/2014-06-05_SODC%20LP2031%20ISSUES%20&%20OPTIONS%20LE). This would bring the total number of dwellings up to 15,950 + 3,540 = 19,490 new homes. Furthermore, 275 houses completed at Chilton, an additional 200 houses are being built at Harwell, and there is outline planning permission for 125 homes to the north of the Harwell Oxford Campus (these housing allocations are not shown in the maps of Chilton Oxford Campus in the Local Plan). Taking these into account, the total dwellings allocated to supporting the science area are 19,490 + 275 + 200 + 125 = 20,090 houses. With the Science Vale ambitiously speculating to create up to 16,000 jobs, it appears that with up to 20,090 houses being built in the general area, that there is more than an adequate provision to support the predicted economic growth. As a direct result of this, it would seem reasonable to remove 1,000 of the houses allocated to the North Wessex Downs AONB and relocate them elsewhere, without it being detrimental to the economy of the Science Vale. This strategy is given further weight by the following quotes from the appendices to the report 'Strategic Assessment of the Vale of White Horse Local Plan 2031 Part 1: Appendices' which state that: 'A low growth scenario at Harwell Oxford Campus would require development elsewhere across the district to meet housing targets. On this basis, it can be argued that a wider distribution of growth (and spending power) could be more beneficial in supporting the rural economy, particularly those areas in the rural west of the district' (SOURCE: URS SA Report, Appendices, Appendix 14, SA3). There is a likelihood that residents in new housing areas at Harwell Oxford Campus would access employment opportunities elsewhere. This has the potential to increase traffic on the A34 which is already known to be congested and operating over its design capacity in peak periods' (SOURCE: URS SA Report, Appendices, Appendix 14, SA3). Hence, the headline strategy of allocating 1,000 dwellings to the 'Science Vale' area is misleading when in fact up to 20,090 houses are being built or have been allocated in the area in total, including around Didcot. As a result, housing provision within the Science Vale is significant. Therefore, to continue to use the Science Vale as a 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 the inconsistency 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 in relation to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the test co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or strategy to 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 150 homes from the North West Harwell Campus (eg reduce the number of houses from 550 to 400 including the 125 outline permission)). ? Include provision of up to 400 new homes (including the 125 already given outline permission) at the West Harwell Campus, provided that all development is contained within the perimeter of the Harwell Oxford Campus and not by the Harwell Oxford Campus. ? Reallocate the 850 homes from the Harwell East Campus and the additional 150 from the North West Harwell Campus (1,000 houses in total) to other sites already identified by the Vale of White Horse, for example Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes) ? (b) Didcot (capacity for 425 houses), or ? (c) Rowstock (capacity for 515 houses), or ? (d) Land West of Steventon (capacity for 350 houses). Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equitably across the district. ? Or reduce the total SHMA allocation for the District by 1000 ? Remove the North Wessex Downs AONB exemption for the Science Vale 'Ringfence' in order to protect it from future speculative development should the Science Vale fall below its housing targets. Only by implementing these steps in full will the Local Plan be compliant with the NPPF paragraph 89 and the CROW Act 2000.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to 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 identified 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.