

Comment

Mr Ian Page (872051)

© 2006 The Authors

Cross House
Church Hill
Chilton
OX11 0SH

Vale of White Horse Local Plan 20

Mr Ian Page

LPPub445

16/12/14 15:14

Core Policy 15: Spatial Strategy for

Submitted

Email

0.3

Yes

No

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

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 have regard to the strategic environmental assessment. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to have regard to the strategic environmental assessment, please use this box to set out your comments.

Paragraph 5.61 states that "Two of our strategic housing sites are located within the North Wessex Downs AONB. Planning permission should be refused except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of: The impact of the development on any national considerations, and the impact of permitting it, or refusing it, upon the local economy The cost of, and the benefits of, the development in the designated area, or meeting the need for it in some other way, and Any detrimental effect on the environment, the landscape, or the extent to which that could be moderated? Despite extensive searching through documents, there are no statements of the Council's policy in 116 of the NPPF. Instead, they have justified the largest housing allocation on any greenfield site in any AONB or National Park. In identifying the preferred site package, the Council first considered those sites that were not located within the North Wessex Downs AONB."

Belt. However, given the level of housing required, sites have been identified within the AONB and Oxford Green Belt to provide homes in the short as well as longer term to restore and maintain a five year housing land supply. Therefore in order to meet the housing requirements of the Local Plan, it is necessary to identify additional sites in AONB and Green Belt. (SOURCE: URS SA Report Final, Paragraphs 13.1.1 and 13.1.2) This statement also states that sites within the AONB have been proposed in order to 'maintain a 5 year housing supply', which does not demonstrate evidence of a need for additional housing. Paragraphs 115 and 116. Further justification for building within the AONB is as follows: 'The Harwell Campus is an existing and important part of the Wessex Downs AONB (present before the AONB was set up in 1972). The Campus is of international importance and is a major centre for science, technology and innovation, and is home to the European Space Agency). It is estimated that at least 1000 people work on the campus. NOTE: The European Space Agency has its headquarters in Paris, not Harwell, and has a number of other sites. There are circa 100 most of whom are already working on the Campus. The Council believes that the international significance of the Campus in these circumstances to justify supporting further development in this AONB location. Any development will need to be sensitive to the landscape whilst delivering a high quality and sustainable village community. The original proposals have been refined and restricted to restricting development to areas where, with planting screening, it would not cause significant visual harm.' (SOURCE: URS SA Report Final, 13.3.6) The VWHDC clearly believe that the economic benefits that might be derived from the proposed job growth in the area are exceptional circumstances with which they should be allowed to build in the North Wessex Downs AONB. Surprisingly, the Local Plan with the Harwell Oxford Campus on housing requirements to support the campus prior to the publication of the Local Plan is further proven when the Harwell Oxford Campus published their initial strategy for the campus which appears to be a need for housing in the area.

supported by policy. No specific allocation proposed. Refer to site TPS 058 ?, with site TPS 058 stating ?The site is Core Policy 13. The policy does however provide some flexibility for redevelopment on the wider site for mixed uses to include as a separate allocation.? (SOURCE: <http://www.whitehorsedc.gov.uk/sites/default/files/Topic%20Paper%20Part%201%20Strategic%20Sites%20and%20Policies%20Housing%20Delivery%20Update%20Supporting%20Paper%20Appendix%205%20Site%20Information%20Tables%20a%20and%20b.pdf>) (http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20a%20and%20b.pdf) states, with regards to Didcot A: ?Sustainability Appraisal: No likely significant negative effects identified. Likely significant positive effects identified. And whilst potential transport issues have been identified, there are committed improvements to the road network at Didcot A. The report further notes that ?Potential opportunities for improved public transport links and the site is well located for access to public transport. The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 (http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20a%20and%20b.pdf) states, with regards to Rowstock: ?Sustainability Appraisal: No significant negative effects identified. Significant positive effects identified. Whilst the site has been identified as having a total capacity for 1,250 houses, 515 are recommended on landscape grounds. Located in the heart of the Science Vale Oxford. Development would contribute through financial contributions to infrastructure measures. Well related to employment centres?. However, the reasons for not developing this site are quoted as ?The site is of coalescence and cumulative impact and a lack of existing services and facilities to enable sustainable development. The site is particularly weak; it is not obvious what the issues of coalescence are, as there are no neighbouring villages identified that could coalesce with. Indeed, by taking the recommended 515 dwellings at the eastern part of the site, there are NO coalescing villages and a petrol station, and a farm shop a short walk up the A4185, and therefore does have some facilities. It is true that the site is not a village, but it is a village in the making. The site is a village in the making. The site is a village in the making.

of 515 houses at the site would enable Rowstock to have its own school and therefore become a self-contained village. Over capacity and struggling to cope with the demands of its recent 80% expansion, the proposed 1,400 houses at Rowstock would require a new primary school to be built. Given that Rowstock is better positioned than Harwell at East Hendred, Harwell, Milton Heights and Steventon in the short term, then there is no justification as to why the Harwell Oxford Campus in terms of access to schools in the short term.

Site 47: Land West of Steventon

The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document (http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%202019-2023%20-%20Final%20Version.pdf) states, with regards to the Land West of Steventon: 'Sustainability Appraisal: No significant negative effects identified against SA objectives 1-7. The whole site has a maximum capacity for 1,175 houses. Under transport, the following was stated 'There are no significant constraints to the south of Abingdon-on-Thames and north of Didcot. Development at this location may lead to a significant direction of travel to Milton Park and Harwell Oxford employment sites and has good access to the A34. The railway line to the south of the site is a significant direction of travel. The reasons for not developing this site were given as 'Existing significant utility infrastructure on the site, and there are also significant highways constraints in the area'. However, this site assessment was carried out on the basis that if houses were built on this site, as recommended on landscape grounds, then much of the above mentioned potential negative effects would be avoided. More than 30% of the site would be taken forward for development. Steventon is also well placed to benefit from improved transport links. The Milton to Didcot, presumably through Steventon, have been described in The Local Plan under Core Policy 17: Delivering a Sustainable South-East Vale Sub-Area. Further to this, Steventon has a good selection of dining pubs, a Co-operative supermarket, and therefore is an attractive place to live.

Site 12: Increased Density on Valley Park Valley Park has already been identified as having an additional capacity for 1,200 dwellings. The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document (http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%202019-2023%20-%20Final%20Version.pdf) states, with regards to Increased Density on Valley Park: 'Sustainability Appraisal: No likely significant negative effects identified against four objectives. With the site being recommended for development because 'The site is well-located to the A34 and is planned as part of a wider masterplan alongside sites 10 and 11. Higher densities should be located towards the A34 corridor between Didcot and Harwell'.

Site 17: Harwell Oxford Campus By contrast, The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document (http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%202019-2023%20-%20Final%20Version.pdf) states, with regards to Site 17 Harwell Oxford Campus: 'Sustainability Appraisal: Likely significant positive effects identified against SA objectives 1-7 and likely significant negative effects against SA objectives 8 (protect cultural heritage and provide a high quality landscape and townscape) as the site is adjacent to the A34 and increased traffic, noise, and light could have an impact on the AONB.

Therefore, a quick appraisal of the potential alternative available sites indicates that the 1,400 houses at the Harwell Oxford Campus can be met through strategic allocations at a combination of aforementioned sites: Didcot A (up to 425 dwellings), Rowstock (up to 350 dwellings) and Increased Density at Valley Park (up to 1,200 dwellings). The total capacity across these sites is viable alternatives to building up to 1,400 houses within the AONB. All are well placed to serve the Science Vale area with less potential negative impacts than the Harwell Oxford Campus site. By reallocating the houses within the AONB to these sites, it is obvious that the need for housing can easily be met in other ways. The last section of the NPPF Paragraph 116 states 'any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which they are carried out and Landscape and Visual Impact Assessment (LVIA), the failings of which will be fully described in the LVIA or no consideration appears to have been given to the detrimental effect on the environment. The original appraisal of White Horse Local Plan 2031 Part 1: Appendices states the following with regards to developing the Harwell Oxford Campus: 'The site has low landscape capacity and no part of the site is suitable for development. The site is located within the AONB along the boundary of the site. Core Policies 34, 37 and 38 would apply; however, such a scale of development with the AONB would likely lead to significant negative effects in terms of the landscape and historic environment particularly in relation to noise and light pollution. As part of design and mitigation measures, development at this site within the AONB would be subject to an AONB Management Plan'. 'SA 9: The site is adjacent to the A34 which could lead to increased traffic (and associated effects for residents nearest the road. The site is in a sensitive location within the AONB which could have significant effects on the AONB. Relevant Core Policies 29 and 33 would apply to reduce the significance of pollution impacts; however given the scale of development, a significant adverse effect'. 'SA 11: The site is a greenfield site which contains 140ha of Grade 2 Agricultural Land. Grade 2 land is the best quality in the borough and should be given greatest protection from development. It is not that such land can be released where deemed necessary'. As such, the Local Plan does not comply with the NPPF and is unsound.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is it will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you wording of any policy or text. Please be as precise as possible.

In order to make the Local Plan sound and legally compliant with the NPPF paragraphs 115 and 116, the following allocation of 850 homes from the Harwell East Campus. ? Remove the additional allocation of 150 homes from the N of houses from 550 to 400 (including the 125 already given outline permission)). ? Include provision of up to 400 ne including the 125 already given outline permission), provided that all development is contained within the perimeter by the Harwell Oxford Campus. ? Reallocate the 850 homes from the Harwell East Campus and the additional 150 h houses in total) to other sites already identified by the Vale of White Horse, for example: ? (a) Valley Park (which ha capacity for up to a further 1,200 homes) ? (b) Didcot A (capacity for 425 houses), or ? (c) Rowstock (capacity for 5 (capacity for 350 houses), or ? (e) Distributed throughout the West Vale in order to encourage and support econom district. ? Or reduce the SHMA allocation by 1000 homes ? Remove the North Wessex Downs AONB entirely from it from future speculative development should 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 neces suggested modification, as there will not normally be a subsequent opportunity to make further representations based on

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issu

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