



**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title

Mr

First Name

Brian

Last Name

Payne

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

6 Manor Close

Line 2

Chilton

Line 3

Didcot

Line 4

Oxon

Post Code

OX11 0SS

Telephone Number

E-mail Address

(where relevant)

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	1.25 NPPF states “plan should be most appropriate strategy when considered against the alternatives”	Policy	Core Policy 4: Meeting our housing need	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please mark as appropriate.

5. 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.

The VWHDC have chosen to allocate two housing developments within the North Wessex Downs AONB, despite there being viable alternative sites out with the AONB, thus failing to comply with the

NPPF paragraph 116 which states that:

“Planning permission should be refused for major developments in these designated areas 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 need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

There are several alternative sites that accommodate the required numbers of houses within the Science Vale without having to build in the AONB. They are:

1. Didcot A: Total Site Capacity up to 425 houses at 25 dwellings/hectare
2. Rowstock: Total Site Capacity up to 1,000 houses at 25 dwellings/hectare
3. Valley Park: Total Site Capacity for up to an additional 1,200 houses
4. Site 47, Land West of Steventon: Total Site Capacity up to 1,175 houses at 25 dwellings/hectare

Analysis of these sites indicates that, on landscape grounds, Didcot A can accommodate 425 dwellings, Rowstock up to 515 dwellings, Valley Park an additional 1,200 dwellings, and the Land West of Steventon up to 350 dwellings. Therefore, there is plenty of scope to reallocate the 1,400 houses from the AONB to alternative, viable sites. (SOURCE: Local Plan 2013 Part 1 Strategic Sites and Policies, Appendix 5 Site Information Tables.)

Appendix 9 of the URS Strategic Assessment of the Vale of White Horse Local Plan 2031 Part 1: Appendices concluded, with respect to 10 sites considered with long term potential, that ***“In terms of the best-performing site options, these are considered to be sites at Valley Park, Didcot A, North West Grove, and Rowstock. They have no significant constraints and would lead to various positive effects, particularly in terms of housing, reducing the need to travel and the local economy, through good access to employment sites and town centres”.***

Currently Didcot A, Rowstock and the Land West of Steventon have no housing allocation.

Therefore, the decision to allocate 1,400 houses the majority on greenfield land in the North Wessex Downs AONB, the largest greenfield allocation in any National Park or AONB in the UK, is not the most appropriate when considered against the alternatives, and is therefore unsound.

The Harwell-Oxford Campus is a long established development dating back to 1946 and was a feature of the AONB when the later was set up in 1972. It is unsound to use its presence as justification for further development outside its boundaries.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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, the following modifications are necessary:

- Remove the entire allocation of 850 homes from the Harwell East Campus.
- Remove the additional allocation of 150 homes on greenfield land from the North West Harwell Campus (eg reduce the number of houses from 550 to 400).
- Include provision of up to 400 new homes (including the 125 already given outline approval) 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.
- 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 1000 houses
- 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.

These steps will make the Local Plan compliant with the NPPF paragraphs 115 and 116, and make the Local Plan compliant with 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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Dec 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

5. 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.

Proposed use of Local Development Orders (LDOs) to speed up delivery on sites, including potentially the Harwell Oxford Campus.

The Harwell Oxford Campus is located entirely within the North Wessex Downs Area of Outstanding Natural Beauty. Although the campus itself established in 1946 is regarded as a brownfield site, any new development within the boundary of the site should still take into account its setting within the North Wessex Downs AONB and the impact it will have on the setting, particularly in terms of visual impacts, noise and light pollution.

Therefore, the appropriateness of using an LDO to speed up the delivery of commercial buildings within the North Wessex Downs AONB has got to be questioned.

(continue on a separate sheet/expand box if necessary)

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Planning laws that take the setting of the North Wessex Downs AONB should still be maintained with regards to development within the Harwell Oxford Campus, and an LDO for the site should not be adopted. A key feature of the Campus and one that gives it an important differentiation from Milton Park is its rural location and this must be retained.

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.

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No, I do not wish to participate at the oral examination

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Signature:

[Redacted Signature]

Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<div>2.14</div>	Policy	<div>Core Policy 4: Meeting our Housing Need</div>	Proposals Map	<div></div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div>X</div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>X</div>
4 (3) Complies with the Duty to co-operate	Yes	<div>X</div>	No	<div></div>

Please mark as appropriate.

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Paragraph 2.14 states that “the high quality and rural nature of the Vale is borne out by the many designations that cover the district, including AONB, and that it is important that development protects and maintains the special characteristics of the built and natural environment”.

The allocation of two sites in the North Wessex Downs AONB of 850 and 550 houses respectively do not help protect and maintain the special qualities of the AONB.

Instead, this allocation is the single largest strategic housing allocation within a mainly greenfield site in any AONB or National Park to date. Indeed, even the allocation of 850 houses alone represents the largest strategic housing allocation on a greenfield site in any AONB or National Park in the UK. (SOURCE: North Wessex Downs AONB Management Board).

Furthermore, such an unprecedented housing allocation within the North Wessex Downs AONB will have significant negative impacts on the landscape and environment as confirmed by URS who state that, with regards to the East Harwell Campus site (SOURCE: URS SA Report, Appendix 11):

- **SA 8: The landscape study recommends that the site has low landscape capacity and no part of the site is suitable for development.** The site is located within the AONB and there is also one Listed Building along the boundary of the site. Core Policies 34 (Landscape), 37 (Design), and 38 (Historic Environment) would apply; **however, such a scale of development within the AONB and surrounding a Listed Building would likely lead to significant negative effects in terms of the landscape and historic environment particularly in relation to important views, natural features, tranquillity and noise and light pollution.** As part of design and mitigation measures, development at this site within AONB should contribute towards the objectives of the AONB Management Plan; Integrated Landscape Character Assessment and the Oxfordshire Wildlife and Landscape Study.
- **SA 9: The site is adjacent to the A34 which could lead to increased traffic (and associated air, noise and light pollution), as well as amenity effects for residents nearest the road. The site is in a sensitive location within the AONB which could have significant negative effects in terms of tranquillity of the AONB.** Relevant Core Policies 29 (Promoting Sustainable Transport and Accessibility) and 33 (Natural Resources) would apply to reduce the significance of pollution impacts; **however given the sensitivity of the AONB this is likely to remain a significant adverse effect.**

If these large scale housing developments within the AONB are permitted, there will be significant consequences for all AONBs, National Parks and the Norfolk Broads.

The special characteristics of the natural environment are not being protected; there is clear non-compliance with paragraphs 115 and 116 of the NPPF, the CROW Act 2000 Section 85, and Core policy 44: Landscape. Therefore the plan is unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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, 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 (eg reduce the number of houses from 550 to 400 n.b. the 400 includes the 125 already given outline permission).
- Include provision of up to 400(including the 125 already given outline permission) new homes 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.
- 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 1000 houses
- 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.

These steps will make the Local Plan compliant with the NPPF paragraphs 115 and 116, and make the Local Plan compliant with 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.

7. 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

☐

Yes, I wish to participate at the oral examination

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Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<div>4.3</div>	Policy	<div>Core Policy 3: Settlement Hierarchy</div>	Proposals Map	<div>Figure 4.2</div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div>X</div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>X</div>
4 (3) Complies with the Duty to co-operate	Yes	<div>X</div>	No	<div></div>

Please mark as appropriate.

5. 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.

It is totally incorrect to refer to The Harwell Oxford Campus as a “Larger Village” throughout the Local Plan. It is an Employment Site with only a small number of houses within its perimeter.

The Harwell Oxford Campus describes itself as follows: “**Harwell Oxford is a 710 acre science, innovation and business campus based in South Oxfordshire**”. (Harwell-Oxford website: <http://www.harwelloxford.com/>)

The Campus is on private land with numerous signs posted around the perimeter of the campus stating that “Private Land. This land is the private property of the United Kingdom Atomic Energy Authority and has not been designated as a Public Right of Way”

The VWHDC Plan uses the basis of speculative potential employment opportunities at the Harwell Oxford Campus employment site as a justification to build 1400 of houses adjacent to the site and entirely within the North Wessex Downs AONB. This building would result in the creation of a new “Larger Village” or “Small Town”.

Paragraph 4.3 also fails to mention that a significant proportion of the South East Vale is within the North Wessex Downs AONB, including the Harwell Oxford Campus which lies entirely within the North Wessex Downs AONB.

As a result, the designation of the Harwell Oxford Campus as a “larger village” is misleading, totally incorrect and therefore unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

Redesignate the Harwell Oxford Campus as an employment site, and not a larger village.

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.

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7. 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

☐

Yes, I wish to participate at the oral examination

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Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="4.7"/>	Policy	<input type="text" value="Core Policy 3: Settlement Hierarchy"/>	Proposals Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

5. 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.

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Chilton has been designated as a “*Smaller Village*” and is defined as a village with a low level of services and facilities, where any development should be modest and proportionate in scale and primarily be to meet local needs.”

Chilton has increased in size by ~80% with the completion of 275 new houses at Chilton Field by Autumn 2014. This is a substantial increase in housing for a “Smaller Village”.

The proposal by the VWHDC to build a further 850 houses at the East Harwell Oxford Campus will place a further 425 houses in Chilton, bringing the total number of houses in Chilton to $365+275+425=1065$. This represents a further 66% increase in the number of dwellings compared to the 625 houses that currently form Chilton village, and a circa300% increase in the number of houses compared to the original Chilton village with ~365 dwellings.

Further to this, the position of the additional 275 houses in Chilton has been omitted from all maps in the Local Plan, and is therefore misleading in terms of housing provision within the AONB, and housing provision close to the Harwell Oxford Campus. It is important to note that these houses were built on a brownfield site that was prior to the development within the perimeter of the Harwell-Oxford Campus.

Moreover, the failure to include the additional 275 houses on the strategic site maps makes it more difficult to assess the true extent of urban sprawl into the AONB, and must be considered in terms of the cumulative impact further developments may have on the sensitivity of the AONB and change its character forever

Therefore, the plan to continually expand the smaller village of Chilton, within the legally protected landscape of the North Wessex Downs AONB, does not comply with Paragraph 4.7, making the plan unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

Remove the East Harwell Campus housing allocation for 850 houses, entirely within the North Wessex Downs AONB, and comply with recommendations that Smaller Villages, such as Chilton, should only be considered for development that is in keeping with local character, is proportionate in scale and meet local housing needs. In order to make the Local Plan sound and legally compliant with NPPF paragraphs 115 and 116, and the CROW Act 2000, 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 (eg reduce the number of houses from 550 to 400(including the 125 already given outline permission)).
- Include provision of up to 400(including the 125 already given outline permission) new homes 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.
- 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 1000 houses
- 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.

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7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

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Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="4.17"/>	Policy	<input type="text" value="Core Policy 5: Housing Supply Ring fence"/>	Proposals Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

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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.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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 (eg reduce the number of houses from 550 to 400(including the 125 already given outline permission)).
- Include provision of up to 400(including the 125 already given outline permission) new homes 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.
- 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 ex Or reduce the total SHMA allocation for the District by 1000
- ample:
 - (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 1000
- 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.

These steps will make the Local Plan compliant with the NPPF paragraphs 115 and 116, and make the Local Plan compliant with 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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="4.18"/>	Policy	<input type="text" value="Core Policy 4: Meeting our housing needs"/>	Proposals Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

5. 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 4.18 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 of 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 the Didcot area on the basis of speculative job creation within the Science Vale. This brings the housing provision for supporting the Science Vale to $10,320 + 3,300 + 2,330 = \mathbf{15,950 \text{ dwellings}}$.

However, the Science Vale sits at the Unitary Boundary between the Vale of White Horse and South Oxfordshire (SO), 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: http://www.southoxon.gov.uk/sites/default/files/2014-06-05_SODC%20LP2031%20ISSUES%20&%20OPTIONS%20LEAFLET-Final.pdf). This would bring the total number of dwellings up to $15,950 + 3,540 = \mathbf{19,490 \text{ new homes}}$.

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 $19,490 + 275 + 200 + 125 = \mathbf{20,090 \text{ houses}}$.

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 this 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 to 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 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 there is uncertainty and contradiction in the Plan on housing numbers and this Alone makes the Plan unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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 (eg 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 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 1000
- 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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<div>4.22</div>	Policy	<div>Core Policy 5: Housing Supply Ring-fence</div>	Proposals Map	<div>Figure 4.3</div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div>X</div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>X</div>
4 (3) Complies with the Duty to co-operate	Yes	<div>X</div>	No	<div></div>

Please mark as appropriate.

5. 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.

The Local Plan states that “the ring fence is a subset of the wider Science Vale geographical area that encompasses the most sustainable locations for development and intentionally excludes its more rural parts”.

However, the ring fence area comprises Harwell Campus and Chilton Field both of which reside in their entirety within the North Wessex Downs AONB. Note Chilton Field was built on a brownfield site that was within the Campus perimeter.

The ring fence, in direct relation to the Harwell Oxford Campus and Chilton, ignores the NPPF 115 and 116, the CROW Act 2000 Section 85, Core Policy 44: Landscape and is therefore unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

Remove the North Wessex Downs AONB from the Housing supply ring-fence.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="4.24"/>	Policy	<input type="text" value="Core Policy 4: Meeting out housing needs"/>	Proposals Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

5. 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 4.24 states that "It is anticipated that this will deliver approximately 23,000 jobs between 2011 and 2031".

The VWHDC appears to have accepted these job figures without any scrutiny.

A recent planning application for 200 homes in Leicestershire in which the planning Inspector Jonathan G King said he could “place little or no reliance” on the local SHMA (produced by GL Hearn) and was unable to give it “Significant weight in the determination of the application”. (SOURCE: <http://majorapps.planningportal.gov.uk/wp-content/uploads/documents/2425527/S62A-2014-0001%20-%20Statement%20of%20Reasons.pdf>). The Inspector also noted that SHMAs should not take into account the “aspirational employment growth of the Local Enterprise Partnership (LEP)” (Paragraph 26).

Further to this, the Oxfordshire Innovation Engine, Realising the Growth Potential, October 2013 (http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf), paragraph 6.10 states that “...road congestion is a major issue for firms: 23% of those responding to our survey identified it as a constraint on growth, and most of those interviewed expressed concerns, particularly in relation to the A34...”

It would therefore seem irresponsible and premature to allocate unprecedented large strategic housing sites on greenfield sites within the legally protected landscape of the North Wessex Downs AONB, particularly if the predicted growth is not realised.

As such, the plan is unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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 (eg reduce the number of houses from 550 to 400 including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus(including the 125 already given outline permission), 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 1000
- 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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="4.43"/>	Policy	<input type="text" value="Core Policy 7: Providing supporting infrastructure"/>	Proposals Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

5. 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 4.43 states that infrastructure delivery is important to ensure new development is sustainable, particularly across the science vale. This is where ~70% of projected jobs and 75% of strategic housing is allocated.

Essential highway infrastructure has been identified to support the identified growth across the Science Vale. Most of the identified improvements are to improve current roads via resurfacing or improving visibility, however the essential highway infrastructure does not address the capacity issues surrounding the A34, nor is there any flexibility within the Local Plan to relocate housing elsewhere if the transport network within the Science Vale fails or leads to nothing but gridlock.

The A34 has already been identified as a barrier to growth for the Science Vale. The SQW report states that Begbroke and Oxford will compete for the same business as Harwell Oxford Campus, and that the A34 is a major barrier to growth:

(SOURCE: http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf)

The URS Strategic Analysis of the Vale of White Horse Local Plan to 2031 Part 1 states: ” **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 of the Vale of White Horse Local Plan to 2031, Appendix 14, SA3)

In addition, the increased traffic on the A34 poses further threats to the tranquillity and character of the AONB. SA 9 of the URS Strategic Analysis states, with regards to the proposed sites at the Harwell Oxford Campus “The site is adjacent to the A34 which could lead to increased traffic (and associated air, noise and light pollution), as well as amenity effects for residents nearest the road. **The site is in a sensitive location within the AONB which could have significant negative effects in terms of tranquillity of the AONB.** Relevant Core Policies 29 (Promoting Sustainable Transport and Accessibility) and 33 (Natural Resources) would apply to reduce the significance of pollution impacts; **however given the sensitivity of the AONB this is likely to remain a significant adverse effect.**” (SOURCE: URS, SA of the Vale of White Horse Local Plan to 2031, Appendix 11)

Furthermore, the “Science Transit and bus Study” for dedicated bus routes from Didcot to Harwell have confirmed that Section 4.2, page 15:

“The following additional locations are also expected to experience regular traffic congestion in future years, as residential and employment growth takes place across the Science Vale:

- v. Hagbourne Hill, northbound approaching the A417 London Road, and southbound approaching the Chilton Interchange (A34/A4185);
- vi. A4185 Newbury Road, southbound from the Harwell Campus to the Chilton Interchange and the bridge across the A34 at the Chilton Interchange”.

These impacts are significant as the ONLY access Chilton residents have to their village is from the access roads adjoining the A4185 at the Chilton Interchange.

Given that the A34 has been identified as a major barrier to economic growth, and that there is a likelihood that development at the Harwell Oxford Campus would add to traffic issues on the A34, it would appear premature to proceed with large strategic housing allocations within the protected landscape of the North Wessex Downs AONB until (a) there is a proven track record of economic growth in the area (b) issues surrounding capacity on the A34 have been addressed and (c) it has been proven that housing must be located in this area with a full analysis as required by the NPPF paragraphs 115 and 116.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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 (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus (including the 125 already given outline permission), 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 1000
- 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. Furthermore, the removal of the housing developments within the North Wessex Downs AONB will likely lead to less people commuting out of the AONB than would be commuting in for work at the Harwell Oxford Campus.

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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="5.42"/>	Policy	<input type="text" value="Core Policy 13: The Oxford Green Belt"/>	Proposals Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

5. 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.

Core Policy 13 relates to protecting the Oxford Green Belt, which was designed to prevent urban sprawl around Oxford, and to preserve the rural setting and special character of the city of Oxford.

However, there is no Core Policy relating to the protection of the North Wessex Downs AONB, and in particular how the VWHDC have/have not complied with the NPPF paragraphs 115 which 116, and also the CROW Act 2000, Section 85 which places a legal obligation on the VWHDC to protect the North Wessex Downs AONB.

Indeed, the North Wessex Downs AONB has a greater level of protection against development than the Oxford Green Belt:

“An AONB is in law equal to a National Park and a Local Authority (down to Parish Council level) are legally responsible for conserving and enhancing an AONB. There is no such legal protection for Green Belt. Green Belts are purely a form of local planning designation – they do not indicate the particular quality of a landscape. As such, Green Belt boundaries can be adjusted by Local Authorities to accommodate development if deemed necessary. AONB boundaries cannot be adjusted by Local Authorities given their national designation and legally protected status. Therefore AONB status is higher than Green Belt, it is the reason that AONB Units exist, and they have Management Plans as another requirement of the CRoW Act 2000”. (SOURCE: North Wessex Downs AONB Management Board)

Further to this, at the Council Meeting on 15th October 2014, where Councillors voted in favour of the Local Plan, The Head of Planning was asked the question “Which has the greater level of protection, the Oxford Green Belt or the AONB?”. They could not readily answer this question, and two further questions were submitted to the council and answered, before he wrongly confirmed that the Oxford Green Belt had greater levels of protection than the AONB. The senior councillors present at the meeting did not correct this statement. If the senior planning officials at the VWHDC do not readily know that the North Wessex Downs AONB has a greater level of legal protection than the Oxford Green Belt, then the decision to allocate an unprecedented number of houses to two greenfield sites within the AONB makes the plan unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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 with NPPF 115, 116 and the CROW Act 2000, the following modifications are necessary:

- Introduce a Core Policy specifically relating to the Protection of the North Wessex Downs AONB, beyond what is covered in Core Policy 44: Landscape
- 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 (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus (including the 125 already given outline permission), 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 1000
- 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.

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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<div>5.54</div>	Policy	<div>Core Policy 15: Spatial Strategy for the South East Vale Sub-Area</div>	Proposals Map	<div></div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div>X</div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>X</div>
4 (3) Complies with the Duty to co-operate	Yes	<div>X</div>	No	<div></div>

Please mark as appropriate.

5. 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 5.54 states that “The South East Vale Sub-Area also houses many attractive villages and approximately half of the area lies in the North Wessex Downs AONB. These more rural settlements are an important part of the wider community and their historic character should be preserved”. It also states in the box on “How the South East Vale Sub-Area will change by 2031” that “The countryside and villages will have maintained their distinctive character”.

“Like many of the villages in Oxfordshire, Chilton has been in existence since before the Domesday survey and its present church since a few years after that time. Also like many other villages, many changes have taken place over the centuries, most of them probably within the last 100 years.”

(SOURCE: <http://www.oxfordshirevillages.co.uk/valevillages/chilton.html>)

The Vale of White Horse District Council has designated Chilton as a “*Smaller Village*” and is defined as a village with a low level of services and facilities, where any development should be modest and proportionate in scale and primarily be to meet local needs.”

Chilton has increased in size by ~80% with the completion of 275 new houses at Chilton Field by Autumn 2014. This is a substantial increase in housing for a “Smaller Village”.

The proposal by the VWHDC to build a further 850 houses at the East Harwell Oxford Campus will place a further 425 houses in Chilton, bringing the total number of houses in Chilton to $365+275+425=1065$. This represents a further 68% increase in the number of dwellings compared to the 625 houses that currently form Chilton village, and a circa 300% increase in the number of houses compared to the original Chilton village with ~365 dwellings.

Further to this, the position of the additional 275 houses in Chilton has been omitted from all maps in the Local Plan, and is therefore misleading in terms of housing provision within the AONB, and housing provision close to the Harwell Oxford Campus. Note that Chilton Field was built on a brownfield site that was within the perimeter of the Harwell-Oxford Campus

Moreover, the failure to include the additional 275 houses on the strategic site maps makes it more difficult to assess the true extent of urban sprawl into the AONB, and must be considered in terms of the cumulative impact further developments may have on the sensitivity of the AONB.

Therefore, the plan to continually expand the smaller village of Chilton, within the legally protected landscape of the North Wessex Downs AONB, does not comply with Paragraph 4.7, making the plan unsound. Indeed, the proposed development at the East Harwell Campus will ensure the coalescence of Chilton into the greater Harwell Oxford Campus.

Furthermore, the decision to allocate 1400 houses to the legally protected landscape of the North Wessex Downs AONB (an unprecedented volume of housing within any National Park or AONB within the UK) will ensure that countryside and character of the landscape around Chilton, entirely within the North Wessex Downs AONB, will be irreversibly damaged.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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, 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 (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus(including the 125 already given outline permission), 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 1000
- 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 character of Chilton be preserved.

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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

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Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<div>5.60</div>	Policy	<div>Core Policy 15: Spatial Strategy for the South East Vale Sub-Area</div>	Proposals Map	<div></div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div>X</div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>X</div>
4 (3) Complies with the Duty to co-operate	Yes	<div>X</div>	No	<div></div>

Please mark as appropriate.

5. 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 5.60 states that “new homes allocated to this sub-area will be in balance with the forecast new jobs thus helping to deliver sustainable growth”.

However, the housing allocation for the sites at East Harwell Campus and North Harwell Campus have already been set out in the VWHDCs Infrastructure Delivery Plan as 635 new homes in the time period 2016-2021, 725 new homes in the time period 2021-2026, and 40 new homes in the time period 2026-2031. (SOURCE: Vale of White Horse Infrastructure Delivery Plan http://www.whitehorsedc.gov.uk/sites/default/files/2014_10_07%20IDP%20final.pdf)

The timescale for housing delivery set out above is actually calculated on “The number of homes linked to infrastructure and their planned delivery from the housing trajectory” (SOURCE; VWHDC Infrastructure Delivery Plan, Summary Key Table, Page 10).

This proposed pre-allocation of housing numbers to fund infrastructure plans contradicts paragraph 5.60 of the Local Plan and will not match employment growth as delivery will be at the mercy of the housing market.

Furthermore, the SQW/Cambridge Econometrics Report states that, in relation to the Harwell Oxford Campus, the “Enterprise Zone will not be completed by 2016 as originally proposed but it is very likely to be completed by 2031”. (SOURCE: SQW/Cambridge Econometrics Report, Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment, Feb 2014 Table K.4, page 117).

It is therefore premature to allocate unprecedented levels of housing to greenfield sites within the AONB, irreversibly destroying a protected landscape that cannot be replaced, especially when there is no accurate and clear year by year job forecast available.

The above statement also proves that the timescales for delivering the Enterprise Zone are very ambitious, and could potentially be completed 15 years after its original deadline of 2016.

It is clear that the housing allocation within the North Wessex Downs AONB is NOT linked to the growth of employment at the Harwell Oxford Campus as stated, and therefore the plan is unsound.

The only people who can truly link housing provision for supporting the Harwell Oxford Campus with the rate of job growth on the Campus is the Harwell Oxford Campus. .

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

To remove 1000 houses from the allocation within the North Wessex Downs AONB until it can be proven beyond doubt that additional housing must be built within the legally protected landscape leaving only 400 houses (including 125 already given outline permission) to be built within the perimeter of the Harwell-Oxford Campus under their control.

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.

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Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<div>5.61</div>	Policy	<div>Core Policy 15:Spatial Strategy for the South East Vale Sub-Area</div>	Proposals Map	<div></div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div>X</div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>X</div>
4 (3) Complies with the Duty to co-operate	Yes	<div>X</div>	No	<div></div>

Please mark as appropriate.

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Paragraph 5.61 states that “Two of our strategic housing sites are located within the North Wessex Downs AONB. Paragraph 116 of the NPPF states that planning permission should be refused except in exceptional circumstances and where it can be demonstrated they are in the public interest”.

Paragraph 116 of the NPPF in full is as follows:

“Planning permission should be refused for major developments in these designated areas 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 need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy

The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way, and

Any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated”

Despite extensive searching through documents, **there are no statements from the VWHDC** which fully comply with paragraph 116 of the NPPF. Instead, they have justified the largest housing allocation on any greenfield site in any AONB or National Park in the UK with the following statements:

“In identifying the preferred site package, the Council first considered those sites that were not located within the North Wessex Downs AONB or the Oxford Green Belt. However, given the level of housing required, sites have been identified within the AONB and Oxford Green Belt.

A mix of sites are required that would deliver homes in the short as well as longer term to restore and maintain a five year housing land supply. Therefore in order to achieve this it has been necessary to consider sites in AONB and Green Belt.”

(SOURCE: URS SA Report Final, Paragraphs 13.1.1 and 13.1.2)

This statement alludes to the fact that large scale housing allocations within the AONB have been proposed in order to “maintain a 5 year housing supply”, which does not demonstrate exceptional circumstances as required by the NPPF 115 and 116.

Further justification for building within the AONB is as follows:

“The Harwell Campus is an existing and well established development within the North Wessex Downs AONB (present before the AONB was set up in 1972). The Campus is of international importance and national economic significance as a world-class centre for science, technology and innovation, and is home to the European Space Agency). It is estimated that at least 5,400 net additional jobs will be created at the campus.”

NOTE: The European Space Agency has its headquarters in Paris, not Harwell, and has a number of other offices worldwide. The Harwell office employs circa 100 most of whom are already working on the Campus.

The Council believes that the international significance of the site provides uniquely exceptional circumstances to justify supporting further development in this AONB location. Any development will need to be sensitively planned to minimise impact on the AONB whilst delivering a high quality and sustainable village community. The original proposals have been refined and reduced based on more detailed landscape advice, restricting development to areas where, with planting screening, it would not cause significant visual harm.” (SOURCE: URS SA Report Final, Paragraphs 13.3.5 and 13.3.6)

The VWHDC clearly believe that the economic benefits that might be derived from the proposed job growth at the Harwell Oxford Campus qualify for the “exceptional circumstances” with which they should be allowed to build in the North Wessex Downs AONB. Surprisingly, the VWHDC do not appear to have consulted with the Harwell Oxford Campus on housing requirements to support the campus prior to the publication of the Local Plan to 2031 in February 2014, a point which was further proven when the Harwell Oxford Campus published their initial strategy for the campus which appears to be at odds with the VWHDC’s vision for housing need in the area.

However, there is no clear statement from the VWHDC on “The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, on the local economy”, and as such is non-compliant with the NPPF Paragraph 116.

KEY POINTS: With regards to the NPPF paragraph 116

- There is unlikely to be any negative impact on the local economy if the 1,400 houses allocated to the North Wessex Downs AONB does not go ahead
- There are viable and alternative sites allocated outside of the North Wessex Downs AONB, but still within the preferred Science Vale, that have already been identified by the VWHDC that can provide the housing needs without building on the North Wessex Downs AONB
- Little regard has been given to the environmental impact of the proposed developments within the North Wessex Downs AONB, particularly with respect to light, noise, pollution and change of character through urbanisation. The cumulative impacts of the proposed developments, combined with development at the Harwell Oxford Campus and the inevitable coalescence of the new development with the “Smaller Village” of Chilton have not been assessed.

The SQW/Cambridge Econometrics Report clearly does not regard housing delivery as a constraint to economic growth; “based on past rates of employment and housing growth there is no evidence that one constrained the other” (SOURCE: Cambridge Econometrics, Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment, Feb 2014, page 40). Therefore, by removing the strategic housing sites within the AONB, economic growth at the Harwell Oxford Campus is unlikely to be constrained.

This assertion is further justified by the number of viable alternative sites close to the Harwell Oxford Campus, outside the AONB, as required by NPPF Paragraph 116 “The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way”.

77% of the Vale of White Horse is NOT within the North Wessex Downs AONB, and the VWHDC states that “It is a fact that we have sufficient land supply to physically meet our housing needs” (SOURCE: Draft Local Plan to 2031, page 17, paragraph 69).

A review of the URS Strategic Assessment Appendices, and the Site Information Tables, confirm that several alternative sites close to the Harwell Oxford Campus, but not inside the AONB, as scoring more favourably in terms of development potential than the sites around the Harwell Oxford Campus.

Appendix 9 of the URS Strategic Assessment of the Vale of White Horse Local Plan 2031 Part 1: Appendices concluded, with respect to 10 sites considered with long term potential, that “***In terms of the best-performing site options, these are considered to be sites at Valley Park, Didcot A, North West Grove, and Rowstock. They have no significant constraints and would lead to various positive effects, particularly in terms of housing, reducing the need to travel and the local economy, through good access to employment sites and town centres***”.

However, the VWHDC has not allocated any housing to either Didcot A or Rowstock, despite them both being within the Science Vale and outside the boundary of the North Wessex Downs AONB.

Didcot A:

Didcot A has the capacity for up to 425 dwellings, with Core Policy 16 of the Local Plan: Didcot A Power Station, page 73, stating that “The provision of other uses on the remainder of the site such as residential, ancillary retail, institutional or community use will be considered favourably”.

The reason stated for not carrying this site forward was given as “Redevelopment of the site to be

supported by policy. No specific allocation proposed. Refer to site TPS 058 “, with site TPS 058 stating “The site is safeguarded primarily for employment through Core Policy 13. The policy does however provide some flexibility for redevelopment on the wider site for mixed uses including residential. Therefore it is not appropriate to include as a separate allocation.”

(SOURCE:

<http://www.whitehorsedc.gov.uk/sites/default/files/Topic%20Paper%203%20reduced.pdf>)

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-%20February%202014.pdf>)

states, with regards to Didcot A:

“Sustainability Appraisal: No likely significant negative effects identified. Likely significant effects identified against four objectives.”

And whilst potential transport issues have been identified, there are committed improvements to the road network at that location, including the dualling of the A4185. The report further notes that “Potential opportunities for improved public transport links and the site is well located for access to Didcot Railway Station.”

Rowstock:

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-%20February%202014.pdf>)

states, with regards to Rowstock:

“Sustainability Appraisal: No significant negative effects identified. Significant positive effects identified against two SA objectives”.

Whilst the site has been identified as having a total capacity for 1,250 houses, 515 are recommended on landscape grounds on the eastern part of the site.

“Transport: Located in the heart of the Science Vale Oxford. Development would contribute through financial contributions to infrastructure delivery including public transport measures. Well related to employment centres”.

However, the reasons for not developing this site are quoted as “This site is not considered appropriate due to issues of coalescence and cumulative impact and a lack of existing services and facilities to enable sustainable development during the early phases”.

These arguments are particularly weak; it is not obvious what the issues of coalescence are, as there are no neighbouring villages identified within the boundary of the site for Rowstock to coalesce with. Indeed, by taking the recommended 515 dwellings at the eastern part of the site, there are NO coalescence issues whatsoever.

Rowstock has a shop and a petrol station, and a farm shop a short walk up the A4185, and therefore does have some facilities. It is true that there is no school at Rowstock, but the provision of 515 houses at the site would enable Rowstock to have its own school and therefore become a self-contained village.

Given that Chilton Primary School is already over capacity and struggling to cope with the demands of its recent 80% expansion, the proposed 1,400 houses at the Harwell Oxford Campus have no access to schooling provision and require a new primary school to be built. Given that Rowstock is better positioned than Harwell Oxford Campus to access primary school places at East Hendred, Harwell, Milton Heights and Steventon in the short term, then there is no justification as to why this site is any less disadvantaged than 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-%20February%202014.pdf>) states, with regards to the Land West of Steventon:

“Sustainability Appraisal: No significant negative effects identified. Significant positive effects against SA Objective 1.”

The whole site has a maximum capacity for 1,175 houses.

Under transport, the following was stated “There are capacity issues on the wider highway network, particularly to the south of Abingdon-on-Thames and north of Didcot. Development at this location may lead to a significant negative effect. The site is located close to Milton Park and Harwell Oxford employment sites and has good access to the A34. The railway line to the south presents a barrier particularly as this is likely to be a significant direction of travel”.

The reasons for not developing this site were given as “Existing significant utility infrastructure would constrain development on this site, and there are also significant highways constraints in the area”.

However, this site assessment was carried out on a housing allocation of 1,175 dwellings. If 350 houses were built on this site, as recommend on landscape grounds, then much of the above mentioned potential negative effects can be completely mitigated as less than 30% of the site would be taken forward for development. Steventon is also well placed to benefit from improved public transport links running between Grove and Milton to Didcot, presumably through Steventon, have been described in The Local Plan under Core Policy 17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area. Further to this, Steventon has a good selection of dining pubs, a Co-operative supermarket, a hairdressers, and a café amongst its services 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 up to 1,200 homes.

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-%20February%202014.pdf>) states, with regards to Increased Density on Valley Park:

“Sustainability Appraisal: No likely significant negative effects identified. Likely significant positive effects against four objectives”.

With the site being recommended for development because “The site is well-located to the Great Western Park development, and should be planned as part of a wider masterplan alongside sites 10 and 11. Higher densities should be located towards the AONB and to minimise any impact on separation of 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-%20February%202014.pdf>) states, with regards to Site 17 Harwell Oxford Campus:

“Sustainability Appraisal: Likely significant positive effects against three objectives. Likely significant negative effects against SA objectives 8 (protect cultural heritage and provide a high quality landscape and townscape) as the site is located within the AONB; and 9 (Reduce noise, light, and air pollution) because the site is adjacent to the A34 and increased traffic, noise, and light could have a significant negative effect on the tranquillity of the AONB.

Therefore, a quick appraisal of the potential alternative available sites indicates that the 1,400 houses at the Harwell Oxford Campus could easily be accommodated through strategic allocations at a combination of aforementioned sites: Didcot A (up to 425 dwellings), Rowstock (up to 515 dwellings), Land West of Steventon (up to 350 dwellings) and Increased Density at Valley Park (up to 1,200 dwellings). The total capacity across these sites is 2,490 dwellings.

These sites provide real and viable alternatives to building up to 1,400 houses within the AONB. All are well placed to serve the Science Vale and all perform better in the Strategic Assessment with less potential negative impacts than the Harwell Oxford Campus site.

By reallocating the houses within the AONB to these other sites, the VWHDC could comply with Paragraph 116 of the NPPF “The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way” as it is obvious that the need for housing can easily be met in other ways.

The last section of the NPPF Paragraph 116 states that an assessment should be included of “any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which they could be moderated”.

Whilst the VWHDC have carried out a Landscape and Visual Impact Assessment (LVIA), the failings of which will be fully described in the response to Paragraph 5.63 of the Local Plan, little or no consideration appears to have been given to the detrimental effect on the environment.

The original appraisal of the site, Appendix 11 of the URS SA of the Vale of White Horse Local Plan 2031 Part 1: Appendices states the following with regards to developing the Harwell Oxford Campus:

“SA 8: The landscape study recommends that the site has low landscape capacity and no part of the site is suitable for development. The site is located within the AONB and there is also one listed building along the boundary of the site. Core Policies 34, 37 and 38 would apply; however, such a scale of development within the AONB and surrounding a listed building would likely lead to significant negative effects in terms of the landscape and historic environment particularly in relation to important views, natural features, tranquillity and noise and light pollution. As part of design and mitigation measures, development at this site within the AONB should contribute towards the objectives of the AONB Management Plan”.

“SA 9: The site is adjacent to the A34 which could lead to increased traffic (and associated air, noise and light pollution), as well as amenity effects for residents nearest the road. The site is in a sensitive location within the AONB which could have significant negative effects in terms of tranquillity of the AONB. Relevant Core Policies 29 and 33 would apply to reduce the significance of pollution impacts; however given the sensitivity of the AONB this is likely to remain a significant adverse effect”.

“SA 11: The site is a greenfield site which contains 140ha of Grade 2 Agricultural Land. Developing this site would result in the loss of Best, Most Versatile Land. Grade 2 land is the best quality in the borough and should be given greatest protection from development; however the NPPF indicates that such land can be released where deemed necessary”.

As such, the Local Plan does not comply with the NPPF paragraphs 115 and 116, or the CROW Act 2000 and is unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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 with the NPPF paragraphs 115 and 116, 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 (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus(including the 125 already given outline permission), 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 SHMA allocation by 1000 homes
- 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.

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No, I do not wish to participate at the oral examination

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Yes, I wish to participate at the oral examination

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<div>5.63</div>	Policy	<div>Core Policy 15: Spatial Strategy for the South East Vale Sub-Area</div>	Proposals Map	<div></div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div>X</div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>X</div>
4 (3) Complies with the Duty to co-operate	Yes	<div>X</div>	No	<div></div>

Please mark as appropriate.

5. 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 5.63 states that a landscape and visual impact assessment of the Harwell Oxford site has been carried out and “The study concludes that the areas proposed for development would not cause significant harm to the AONB and can be successfully mitigated”.

KEY POINTS:

- The conclusion of the Hankinson Duckett Associates report that “The character of the AONB would change but these changes would be compatible with the management plan and would not constitute significant harm to the wider AONB landscape” is both misleading and inaccurate.
- The AONB Management Plan clearly states that the most pressing Key Issues affecting the North Wessex Downs AONB include:
- The proposed developments, in particular the East Harwell Campus, are on an important open landscape between the Harwell Campus, Harwell village and urban Didcot. The scale of development at Didcot extends right up to the northern perimeter of the North Wessex Downs AONB and as a result it is important to maintain the rural gap between the Didcot developments and the Harwell Oxford Campus.
- The LVIA assessment carried out by the Hankinson Duckett Associates Report on the North Harwell Oxford Campus is significantly smaller than the land allocated for development in the Local Plan 2031 and does not extend all the way to the A4185 as proposed in the development map for the area.

This statement is misleading. (SOURCE: HARWELL CAMPUS Landscape Study by Hankinson Duckett Associates for Vale of White Horse District Council <http://www.whitehorsedc.gov.uk/sites/default/files/2014-07-25%20Main%20Report.pdf>). The document states:

“This is a high level Landscape Study and consequently does not analyse all possible visual receptors or viewpoints. A more detailed assessment should be carried out as part of any future housing development”

The sites proposed for development have a very distinct character forming a transition between the high downs and the clay lowlands of the Vale of White Horse. The Northern site forms an important open landscape between the Harwell Campus, Harwell village and urban Didcot.

The sites fall entirely within the AONB, a high value landscape of high sensitivity. It does not comply with the stated aims of the AONB, AONB guidance and policy, or Vale of White Horse Core Policy 34 relating to the protection of the AONB.

The Icknield Way regional cycle path passes through the sites. The historic and nationally important Ridgeway National Path is located a short distance to the south.

Both of these strategic rights of way are of high value and are located within open landscapes of high value. The characteristics of The Icknield Way will change from open landscape to urban through the development of the site. The Ridgeway will be directly affected, by the visual impact of the housing and there will be a significant urbanisation of the landscape context in which the route is located.

The site is a characteristic of the Hendred Plain Landscape Character Area and is entirely within the North Wessex Downs AONB. The proposed development of East Harwell will be out of scale with the small scale developments in the surrounding villages.

The Icknield Way is a popular cycle route that runs east to west through East Harwell within a highly characteristic open and expansive landscape. Development of the site will result in the loss of the open character and the route running through an urban area.

‘National Planning Policy Framework’ (NPPF) (DCLG) (2012), which states at paragraph 115:

“Great weight should be given to conserving landscape and scenic beauty National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.”

The highest level of protection is fundamental, and the sacrificing of an important and distinctive protected landscape for development is not acceptable when it is clear that there are large areas, ~77%, of the District outside the sensitive locations of the AONB. Several potentially viable alternative sites, with no current housing allocations, have been identified by the VWHDC which scored more favourably against the strategic

objectives than the two sites within the AONB in the SA Scoring Summary Tables (SOURCE: URS SA of the Vale of White Horse Local Plan 2031). The justification given for this site is very tenuous and contains little detail. Bearing in mind paragraph 115 of NPPF, and the Significant Negative impacts, any justification for overturning national guidance, and the wholesale degradation of a nationally designated landscape, has got to be extremely strong and a truly exceptional circumstance. There is no evidence to suggest that this is the case.

(continue on a separate sheet/expand box if necessary)

ANOMOLIES IN SUPPORTING INFO:

(source: <http://www.whitehorsedc.gov.uk/sites/default/files/Part2%202014-07-25%20Supporting%20PlansReduced.pdf>)

- HDA 4: Land parcel 2 for site 19 is different to the land allocated by the VWHDC for development. The Chilton Field Development is shown, but the true extent of the development has not been shown accurately, with the indication of development here being smaller than the actual development. The Chilton Field Development, completed in 2014 resulting in the 80% expansion of Chilton, has been omitted, thereby giving a false impression of the true provision of homes around the Harwell Oxford Campus and the degree of urban sprawl within and adjacent to the AONB. The Land for the North Harwell Campus development, as specified in the above document, is far smaller than the final site proposed for development on page 36 of the Local Plan Part 1 Strategic Sites and Policies Appendices. Therefore, it cannot be an accurate reflection of the potential visual impact of the site.
- HDA 5: Land parcels G and H for site 19 are different to the land allocated by the VWHDC for development.

The conclusions of the Hankinson Duckett report state that **“The character of the AONB would change but these changes would be compatible with the management plan and would not constitute significant harm to the wider AONB landscape.”**

Whilst the visual impacts may have the potential to be mitigated to an unsatisfactory extent, the proposals are not compatible with the AONB Management Plan. Instead, the proposal to build on two sites in the North Wessex Downs AONB exacerbate and compound the key issues affecting the AONB as set out in the AONB Management Plan:

- The threat of expansion of the main urban areas just beyond the boundary of the North Wessex Downs, including the main centres of ... Wantage, Didcot ... for example creating urban fringe pressures and impact on the setting of the AONB.
- New housing developments on greenfield sites
- Development that results in a material loss of tranquillity and or impact on the dark night skies within the North Wessex Downs or its setting
- Unsympathetic incremental expansion of the settlements of and adjacent to the AONB, detracting from the surrounding countryside
- The pressure for new developments at junctions of the M4 and A34
- New road building, new road signage and new street lighting
- Lack of knowledge about the boundaries of the current
- pools of tranquillity and dark night skies within the AONB and the implications of light spillage from development in and around the AONB

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 also requires a description of the likely significant effects of a development which specifically includes the assessment of cumulative effects.

EC Directive 85/337/EEC, as amended by Directive 97/11/EC, requires consideration of the direct, indirect, secondary and cumulative impacts of a project. The EIA Directive also requires consideration of the interactions between potential environmental impacts.

The scale of proposed development around the Harwell Oxford Campus is also entirely out of character with the “typically modest villages” within the North Wessex Downs AONB. Instead, the proposed development is unprecedented in scale in any National Park or AONB within the UK; the outcome of this decision will have untold implications for all National Parks and AONBs. Not only is the scale of proposed development unprecedented, it ensures the coalescence of Chilton into the new proposed East Harwell Development (425 houses of which are likely to be built in Chilton Parish), engulfing North Drive, extending into the proposed North West Harwell Campus development and the Harwell Campus itself.

The plan even suggests the creation of a new self sustainable community!

The resulting "settlement" would potentially have one of the largest populations of any settlement within the entire North Wessex Downs AONB. $365 + 275 + 75 + 1400 + 125 = 2,240$ dwellings (Chilton (old) + Chilton Field + North Drive + NEW HOUSING + planning already at North Drive). Taking an average population per dwelling of 2.3, the $2,240 \times 2.3 = 5,152$ population would place the Harwell Campus with the third largest population in the NWD AONB after Marlborough (population of 8009 at 2001 census), and Hungerford (population of 5559 at the 2001 census).

In terms of total area, the combined Harwell Campus and planned residential housing would most likely be the largest urbanised area within the entire North Wessex Downs AONB.

Policy NE6 relates to development within the AONB and states that:

'Development in the North Wessex Downs area of outstanding natural beauty will only be permitted if the natural beauty of the landscape will be conserved or enhanced.

Development which would be visually prominent, would detract from views from public vantage points or would spoil the appreciation of the landscape quality of the North Wessex Downs area of outstanding natural beauty will not be permitted.

Major industrial or commercial development will not be permitted in the area of outstanding natural beauty unless:

- i) it is proven to be in the national interest and no alternative site can be found; and*
- ii) all steps are taken to reduce the impact of the development on the beauty of the area."*

The URS Strategic Analysis of the Vale of White Horse Local Plan 2031 Appendices Appendix 14 "Harwell Oxford Campus Site Options", states the following with regards to the land parcels used in the Hankinson Duckett Associates Report:

"SA 2: "...A wider distribution of growth (and spending power) could be assumed to support services and facilities in the rural areas – particularly those areas in the west of the district – more than by focussing growth at Harwell Oxford Campus."

"SA 3: ...The four options would all lead to positive effects by linking housing to employment opportunities; however, the scale of development would likely lead to an increase in traffic on the local roads. 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"

"SA 6: It is noted that a high-growth approach at Harwell Oxford Campus would reduce the amount of development in the remainder of the district. A low-growth approach at Harwell Oxford Campus would require development elsewhere across the district to meet housing targets. On this 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."

"SA 8:Parcels A, B and G are the parcels most capable of being mitigated." However, the VWHDC have chosen to develop parcels A, B, G and H with areas C and D allocated for a school and leisure, so they have not chosen the least harmful development options.

"SA 9: The scale of development at the site would likely generate additional vehicle movements which could lead to potential noise and air impacts locally. This site is in a sensitive location which could have a significant effects in terms of tranquillity of the AONB...If it can be assumed that a greater scale of development would likely lead to a greater effect in terms of air, noise and light pollution in the AONB then Option A (land parcels A, B, and G) would be the best performing due to lowest growth and least impact on the AONB." However, the VWHDC have chosen to run with option of developing A, B, G and H with a school on land C and D, not the option that impacts the AONB the least.

It is also incumbent on the Local Authority to take account of Section 85 of the Countryside and Rights of Way (CROW) Act 2000 which states: *In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, **a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty**...*A relevant authority for the purposes of this section includes.....3(a) Any public body includes a county council, borough council, district council... .

As a result, the impacts associated with the environmental impact of the two proposed sites within the North Wessex Downs AONB have not been properly assessed and the increased light, noise and pollution cannot be fully mitigated.

The cumulative environmental impact of the East Harwell Campus and the North Harwell Campus have not been considered alongside the impact of developing the Harwell Oxford Campus itself, nor has the cumulative impact of the inevitable coalescence with the "Smaller Village" of Chilton and the significant change in the character of the local area been considered.

As a result, the plan is unsound.

6. 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 at 5 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, 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 (eg reduce the number of houses from 550 to 400(including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus(including the 125 already given outline permission), 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 SHMA allocation by 1000 homes
- 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.

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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<div>5.59</div>	Policy	<div>Core Policy 15: Spatial Strategy for the South East Vale</div>	Proposals Map	<div></div>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<div>X</div>	No	<div></div>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<div></div>	No	<div>X</div>
4 (3) Complies with the Duty to co-operate	Yes	<div>X</div>	No	<div></div>

Please mark as appropriate.

5. 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 5.59 states that the provision of new housing in this area will help to improve the self-sufficiency of the South East Vale and provide opportunities for living closer to places of work. The “How the South East Vale Sub-Area will change by 2031” statement, page 68, says “New housing at

the Harwell Oxford Campus will have provided an exemplar development and function as a thriving community, successfully integrated with the science campus and provide accommodation for many of the site's employees."

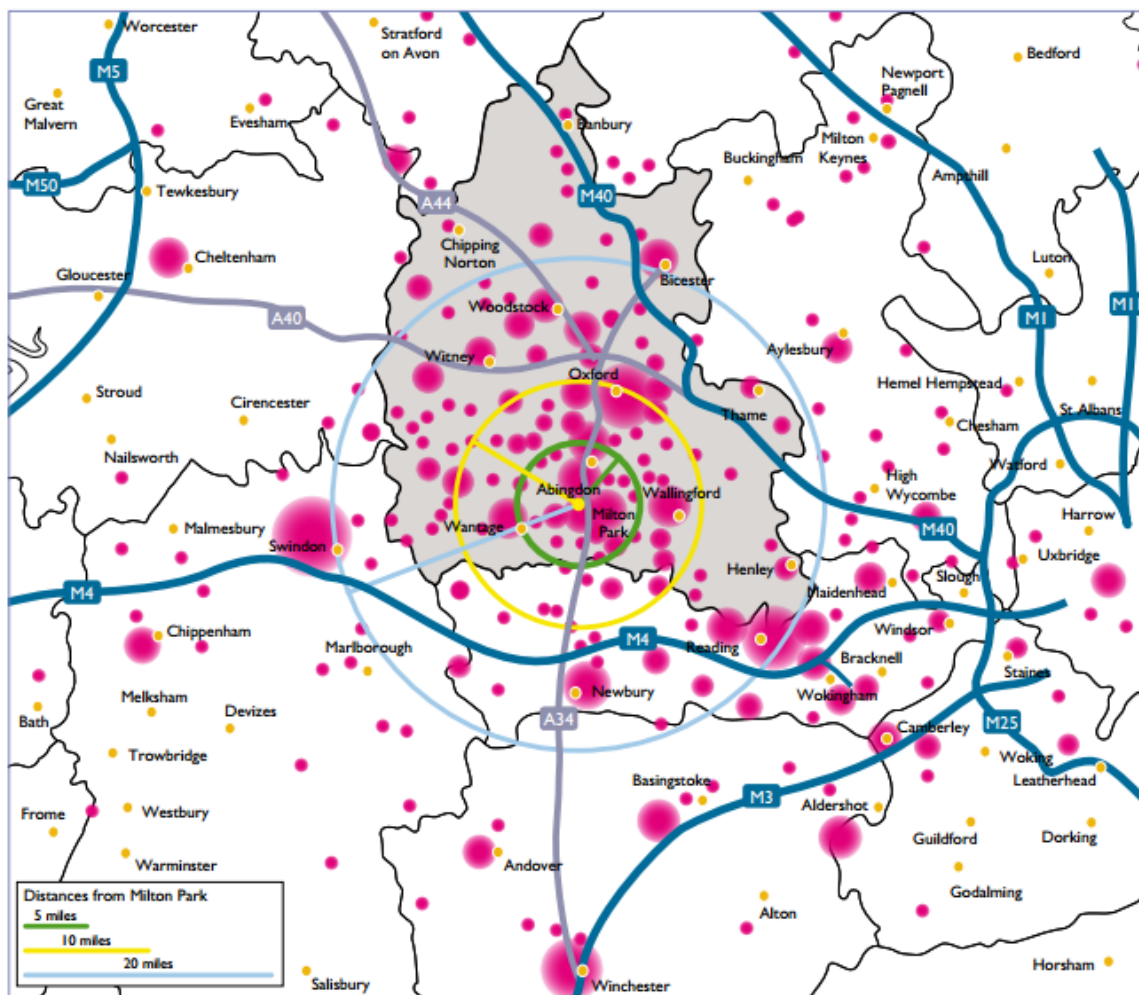
The current Chilton demographic indicates that only ~12% of Chilton residents actually work at the Harwell Oxford Campus (SOURCE: Petition against the Harwell East Development submitted to the VWHDC in Feb 2014).

Nationally, the average commuting distance was 15km in 2011 (2011 census). Furthermore, the 2001 census for the Harwell Ward indicated that 95% of employees in Harwell did not live in Chilton or Harwell villages.

Figure 6.1 in The Milton Park Travel Survey 2012 demonstrates that employees at Milton Park travel vast distances, with significant numbers of employees travelling from Winchester, Swindon, Reading, Abingdon, Oxford, Bicester and Witney.

Given that people choose to live in a specific area for a multitude of different reasons, it seems presumptuous for the VWHDC to assume that "many of the Harwell Oxford's employees" will choose to live on the campus. Indeed, current and historical records and current Chilton demographic demonstrate that this is not the case and therefore is poor justification for an unprecedented level of housing within the AONB.

FIGURE 6-1: Milton Park – daily travel to work pattern 2012



Source: Milton Park Travel Survey, MEPC (Based on response from 134 companies on site in Winter, 2012.)

The average commuting distance within the Vale of White Horse, as at the 2011 census, is 15.9km, with the corresponding figure for South Oxfordshire being 17.2km. It is therefore reasonable to expect that people will continue to commute to the Harwell Oxford Campus from Reading, Abingdon, Newbury and Reading.

(continue on a separate sheet/expand box if necessary)

In addition, up to a 20% a price premium is applied to housing within the North Wessex Downs AONB compared to the same style of house by the same house builder at Great Western Park in Didcot. A summary of the price premium applied by David Wilson Homes for living in Chilton compared to Didcot is provided below:

- The "Chelworth": £530,000 at Chilton, £439,995 at Didcot
- The "Holden": £485,000 at Chilton, £425,000 at Didcot
- The "Cornell": £415,000 at Chilton, £390,000 at Didcot

Further to this, the URS Strategic Analysis of the Vale of White Horse Local Plan to 2031 Part 1 states:

" 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."

(continue on a separate sheet/expand box if necessary)

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In order to make the Local Plan sound and legally compliant, 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 (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus(including the 125 already given outline permission), 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 1000
- 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.

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Signature:

Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

5. 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.

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Paragraph 5.68: "There is an ambitious programme of jobs creation and growth for the science vale area, including two Enterprise Zone sites at Harwell Campus and Milton Park designated in 2011. It is important this growth is delivered alongside new housing and the provision of appropriate infrastructure to help make the area more self-contained and to achieve a sustainable pattern of development."

Delivery of Housing under the Plan will be solely led by the housing market. It is particularly important that any housing associated with the Harwell-Oxford Campus is controlled by the Campus so that it can meet the needs of employees and keep pace with employment growth.

(continue on a separate sheet/expand box if necessary)

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In order to make the Local Plan sound and legally compliant with NPPF 115, 116 and the CROW Act 2000, the following modifications are necessary:

- Introduce a Core Policy specifically relating to the Protection of the North Wessex Downs AONB, beyond what is covered in Core Policy 44: Landscape
- 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 (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus (including the 125 already given outline permission), 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 1000
- 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.

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8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

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Signature:

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Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Proposals Map

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4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

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Paragraph 5.73: "A key challenge to the continued attractiveness of this rapidly expanding area is the capacity of the road network and a number of improvements have been identified in the Science Vale Area Strategy."

The A34 has already been identified as a barrier to growth for the Science Vale. The SQW report states that Begbroke and Oxford will compete for the same business as Harwell Oxford Campus, and that the A34 is a major barrier to growth:
(SOURCE: http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf)

The URS Strategic Analysis of the Vale of White Horse Local Plan to 2031 Part 1 states: " **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 of the Vale of White Horse Local Plan to 2031, Appendix 14, SA3)

In addition, the increased traffic on the A34 poses further threats to the tranquillity of the AONB. SA 9 of the URS Strategic Analysis states, with regards to the proposed sites at the Harwell Oxford Campus "The site is adjacent to the A34 which could lead to increased traffic (and associated air, noise and light pollution), as well as amenity effects for residents nearest the road. **The site is in a sensitive location within the AONB which could have significant negative effects in terms of tranquillity of the AONB.** Relevant Core Policies 29 (Promoting Sustainable Transport and Accessibility) and 33 (Natural Resources) would apply to reduce the significance of pollution impacts; **however given the sensitivity of the AONB this is likely to remain a significant adverse effect.**" (SOURCE: URS, SA of the Vale of White Horse Local Plan to 2031, Appendix 11)

The "Science Transit and bus Study" for dedicated bus routes from Didcot to Harwell have confirmed that Section 4.2, page 15:

"The following additional locations are also expected to experience regular traffic congestion in future years, as residential and employment growth takes place across the Science Vale:

v. Hagbourne Hill, northbound approaching the A417 London Road, and southbound approaching the Chilton Interchange (A34/A4185);

vi. A4185 Newbury Road, southbound from the Harwell Campus to the Chilton Interchange and the bridge across the A34 at the Chilton Interchange".

These impacts are significant as the ONLY access Chilton residents have to their village is from the access roads adjoining the A4185 at the Chilton Interchange.

Given that the A34 has been identified as a major barrier to economic growth, and that there is a likelihood that development at the Harwell Oxford Campus would add to traffic issues on the A34, it would appear premature to proceed with large strategic housing allocations within the protected landscape of the North Wessex Downs AONB until (a) there is a proven track record of economic growth in the area (b) issues surrounding capacity on the A34 have been addressed and (c) it has been proven that housing must be located in this area with a full analysis as required by the NPPF paragraphs 115 and 116.

The concentration of housing alongside the A34 makes significant problems inevitable.

The Plan is not infrastructure led

The Science Vale Strategy has not been completed and published.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

Until Infrastructure issues are properly addressed and it can be demonstrated that the Plan properly complements The Science Vale Area Strategy the 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 (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus (including the 125 already given outline permission), 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 1000
- 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.

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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

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Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

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Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

5.108

Policy

Core Policy
15

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-
operate

Yes

X

No

Please mark as appropriate.

5. 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 5.108: "The conservation and enhancement of the North Wessex Downs AONB together with its Management Plan will be supported (as required by the Countryside and Rights of Way (CROW) Act 2000).

Section 85 of the Countryside and Rights of Way Act 2000 places a general duty on public bodies to:

“ In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty...A relevant authority for the purposes of this section includes any (a) Minister of the Crown;(b) any public body (c) any statutory undertaker. 3(a) Any public body includes a county council, borough council, district council (c) a joint committee appointed under section 102 (1) (b) of the Local Government Act 1972.”

To meet the requirements of Section 85 of the CRoW Act, South East Regional Assembly is statutorily obliged to take into account the objectives and purposes of AONBs in its policy formulation and decision-including the South East Plan submission draft.

By proposing two large strategic housing allocations within the North Wessex Downs AONB, the VWHDC are not abiding by its legal duty to “conserve and enhance the natural beauty of the area of outstanding natural beauty”. Not only that, the decision by the VWHDC to propose such unprecedented numbers of housing to the North Wessex Downs AONB prevents Chilton Parish Council, Harwell Parish Council and the Hendreds Parish Council from fulfilling their legal obligations under the CRoW Act 2000 to conserve the natural beauty of the area.

The North Wessex Downs AONB is a sparsely populated landscape with a population density of 72 people per square kilometre (compared to an average for West Berkshire of 205 people per square kilometre). The open, uninhabited uplands retain a strong sense of remoteness and tranquillity – a very special perceptual characteristic within this densely populated part of southern England.

http://www.northwessexdowns.org.uk/uploads/docs/manplan/NWD08_Development.pdf

Further to this, the North Wessex Downs AONB clearly state that the most pressing issues adversely affecting the North Wessex Downs AONB include:

Key Issues affecting the North Wessex Downs AONB:

- **Expansion of the main urban areas just outside the AONB creating urban fringe pressures on the boundaries of the AONB.**
- New large free-standing houses as replacement dwellings in open countryside and insensitive farm diversification activities and associated signage.
- **Unsympathetic incremental expansion of the settlements of and adjacent to the AONB, detracting from the surrounding countryside.**
- **Potential for major development to intrude onto open downland, including masts, pylons, major wind turbine developments, and mineral extraction and waste management, threatening the senses of remoteness and tranquillity.**
- The future use of redundant ‘brown field’ sites within the AONB, especially redundant airfields and military sites (as at Wroughton), and the impact upon landscape.
- **The pressure for new developments at junctions of the M4 and A34.**
- Lack of knowledge about the boundaries of the current pools of tranquillity and dark night skies within the AONB and the implications of light spillage from development in and around the AONB.

This matter is covered in the introduction to the AONB's statutory Management Plan 2009-2014 that the Local Authority, the Vale of White Horse District Council, is a partner of.

(continue on a separate sheet/expand box if necessary)

The allocation of 850 houses at the East Harwell Campus site represents the single largest greenfield housing site that the North Wessex Downs AONB Management Board are aware of in any nationally protected landscape at this point in time. Unlike West Berks, much of which lies within AONB, the single strategic allocation of 1,400 houses into an AONB within the Vale of the White Horse is unnecessary since most of the District lies outside the AONB (77% outside).

The proposed allocation of 1,400 houses across two sites at the East Harwell Oxford Campus and the North West Harwell Oxford Campus is **without precedent** in any National Park or AONB within the UK. To put the scale of proposed development at the Harwell Oxford Campus into context with regards to other proposed developments within the North Wessex Downs AONB, a general summary of other proposed housing allocations in the AONB is provided below (SOURCE: North Wessex Downs AONB):

Wiltshire

- Marlborough – 220 dwellings to Salisbury Road
- There are other houses into both the Pewsey and Marlborough Areas – we believe these can be accommodated mostly on brownfield sites or the odd small greenfield edge of village location.
- A small scheme for about 50 houses on a well located site at Burbage.

West Berks

2000 houses into the **whole** AONB – this is actually a residual of about 400 homes which will be divided up between Compton (brownfield site) and mostly to Hungerford, Pangbourne and Lambourn.

- Essentially of the 2000 houses allocated into the AONB (74% of West Berks is in the AONB) most of these have already been delivered into existing settlements, brownfield, conversions etc. without new greenfield site releases.
- Therefore there are only actually about 400 new homes now needed of the original 2000. This was also an area based policy not a single site allocation. Of the remaining 400 these will again be mostly brownfield, within settlement with the odd small greenfield site (perhaps 20 to 50 houses if required at all).
- The phrase we had included in the West Berks Core Strategy to reduce the potential level of greenfield housing was:
“If preparation of the Site Allocations and Delivery DPD indicates that there are insufficient developable sites to provide the balance of the 2,000 dwellings whilst adhering to the landscape priority of the policy, any shortfall will be provided on sites allocated outside the AONB.”
- The North Wessex Downs AONB Management Boards’ preference remains small scale brownfield or the odd small greenfield where acceptable in landscape terms.
- There is provision in the Core Strategy to move housing out of the AONB if the residual requirement cannot be met by suitable sites.
- (We have undertaken landscape work on all relevant Wiltshire/West Berks villages in the NWD AONB.)

Basingstoke and Deane

Whitchurch, Hampshire – 150 houses

Test Valley, Swindon, South Oxfordshire – no housing allocations into the NWD AONB.

(continue on a separate sheet/expand box if necessary)

Moreover, a number of misleading or inaccurate statements have also been issued by the VWHDC with regards to the scale of proposed development within the North Wessex Downs AONB. "The future of the Vale Local Plan 2031: consultation on the draft plan, November 2014" leaflet that was sent to every household states, with regard to the Green Belt and AONB, that:

"In the 'Housing Delivery Update' to the Local Plan that we published earlier this year, we included a number of housing sites in the Oxford Green Belt and the North Wessex Downs AONB. You told us that this was an area of real concern to you. We have taken into account recent changes in guidance and listened to the feedback from organisations like Natural England and the Campaign for the Protection of Rural England and have adjusted the number of sites and the total number of houses being allocated in these areas".

Whilst the number of sites and the number of houses have been reduced for the Oxford Green Belt, this is not true for the North Wessex Downs AONB. Instead, the North Wessex Downs AONB now has two strategic housing sites compared to the original one, and the number of houses that have been allocated to the AONB remains at 1,400, albeit now spread across two sites on opposite sides of the A4185.

Whilst the East Harwell Campus site has been reduced from 1,400 to 850 houses. The North West Harwell Campus site, from the 2011 Local Plan with an original capacity for up to 400 homes, has been reinstated with the addition of another 150 homes, bringing its total housing allocation to 550 houses. As such, the total number of houses allocated to the North Wessex Downs AONB is still 1,400 homes; the largest strategic housing allocation in any National Park or AONB within the UK. Furthermore, no reference is made to listening to the guidance and feedback from the North Wessex Downs AONB Management Board.

Indeed, the VWHDC seem to be giving greater consideration to preserving the Oxford Green Belt rather than the North Wessex Downs AONB. This fact is further illustrated by the comments made by senior planning officials at the Council Meeting on 15th October 2014, where Councillors voted in favour of the Local Plan. The Head of Planning was asked the question "Which has the greater level of protection, the Oxford Green Belt or the AONB?". They could not readily answer this question, and two further questions were submitted to the council and answered, before they wrongly confirmed that the Oxford Green Belt had greater levels of protection than the AONB. Senior Councillors present at the meeting, did not correct this. If the senior planning officials at the VWHDC do not readily know that the North Wessex Downs AONB has a greater level of legal protection than the Oxford Green Belt, then the soundness of the decision to allocate an unprecedented number of houses to two greenfield sites within the AONB has got to be questioned. The minutes from this meeting were not available at the time of writing, but should be available to the Inspector at the time of review. I trust the minutes will accurately reflect the discussions of that evening.

(continue on a separate sheet/expand box if necessary)

Indeed, the North Wessex Downs AONB has a greater level of protection against development than the Oxford Green Belt:

"An AONB is in law equal to a National Park and a Local Authority (down to Parish Council level) are legally responsible for conserving and enhancing an AONB. There is no such legal protection for Green Belt. Green Belts are purely a form of local planning designation – they do not indicate the particular quality of a landscape. As such, Green Belt boundaries can be adjusted by Local Authorities to accommodate development if deemed necessary. AONB boundaries cannot be adjusted by Local Authorities given their national designation and legally protected status. Therefore AONB status is higher than Green Belt, it is the reason that AONB Units exist, and they have Management Plans as another requirement of the CROW Act 2000". (SOURCE: North Wessex Downs AONB Management Board)

It is clear that the Local Plan 2031 does not comply with paragraph 5.108 and, as such, the Local Plan 2031 does not follow legal guidelines and is unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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, 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 (eg reduce the number of houses from 550 to 400(including the 125 already given outline permission)).
- Include provision of up to 400 new homes at the North West Harwell Campus(including the 125 already given outline permission), 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 1000
- 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.

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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

6.69

Policy

Core Policy
34: A34
Strategy

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-
operate

Yes

X

No

Please mark as appropriate.

5. 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 6.69: "The baseline statement examined a number of possible improvements to the A34 and its immediate feeder routes. It also identified that it was likely that by 2030, congestion along the route would take place more frequently, and that instances of network congestion outside of peak hours

would increase and that they may occur at any time of the day including weekends. The Statement suggested that congestion may occur through most weekdays and at weekend peak periods.”

The A34 has already been identified as a barrier to growth for the Science Vale. The SQW report states that Begbroke and Oxford will compete for the same business as Harwell Oxford Campus, and that the A34 is a major barrier to growth:

(SOURCE: http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf)

The URS Strategic Analysis of the Vale of White Horse Local Plan to 2031 Part 1 states: ” **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 of the Vale of White Horse Local Plan to 2031, Appendix 14, SA3)

In addition, the increased traffic on the A34 poses further threats to the tranquillity of the AONB. SA 9 of the URS Strategic Analysis states, with regards to the proposed sites at the Harwell Oxford Campus “The site is adjacent to the A34 which could lead to increased traffic (and associated air, noise and light pollution), as well as amenity effects for residents nearest the road. **The site is in a sensitive location within the AONB which could have significant negative effects in terms of tranquillity of the AONB.** Relevant Core Policies 29 (Promoting Sustainable Transport and Accessibility) and 33 (Natural Resources) would apply to reduce the significance of pollution impacts; **however given the sensitivity of the AONB this is likely to remain a significant adverse effect.**” (SOURCE: URS, SA of the Vale of White Horse Local Plan to 2031, Appendix 11)

The “Science Transit and bus Study” for dedicated bus routes from Didcot to Harwell have confirmed that Section 4.2, page 15:

“The following additional locations are also expected to experience regular traffic congestion in future years, as residential and employment growth takes place across the Science Vale:

v. Hagbourne Hill, northbound approaching the A417 London Road, and southbound approaching the Chilton Interchange (A34/A4185);

vi. A4185 Newbury Road, southbound from the Harwell Campus to the Chilton Interchange and the bridge across the A34 at the Chilton Interchange”.

These impacts are significant as the ONLY access Chilton residents have to their village is from the access roads adjoining the A4185 at the Chilton Interchange.

Given that the A34 has been identified as a major barrier to economic growth, and that there is a likelihood that development at the Harwell Oxford Campus would add to traffic issues on the A34, it would appear premature to proceed with large strategic housing allocations within the protected landscape of the North Wessex Downs AONB until (a) there is a proven track record of economic growth in the area (b) issues surrounding capacity on the A34 have been addressed and (c) it has been proven that housing must be located in this area with a full analysis as required by the NPPF paragraphs 115 and 116.

As a result, the Local Plan is unsound.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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.

Given the speculative job growth within the Science Vale, and the transport issues surrounding the A34 and the barrier that congestion poses to economic growth in the Science Vale, it would appear to be premature to proceed with the largest strategic housing allocations on greenfield sites within the legally protected landscape of the North Wessex Downs AONB until such times as economic growth in the Science Vale is established and transport issues have been remedied.

Only by removing the large scale strategic housing allocations at the Harwell Oxford Campus can the VWDC fully comply with the NPPF paragraphs 115 and 116, and the CROW Act 2000 Section 85.

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.

7. 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

☐

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary: ☐

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph

6.111

Policy

Core Policy
44:
Landscape

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared,
Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-
operate

Yes

X

No

Please mark as appropriate.

5. 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 6.111: "The conservation of the intrinsic character and beauty of the countryside is a core planning principle of the NPPF stating that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes."

Rather than striving to protect and enhance valued landscapes, the VWHDC have allocated the largest strategic housing allocation within any National Park or AONB in the whole UK. The single allocation of 850 houses within the North Wessex Downs AONB in itself is unprecedented in scale. However, the VWHDC have allocated a further 550 houses to the North Harwell Campus bringing the total number of houses allocated to the North Wessex Downs AONB to 1,400.

As such, the VWHDC have been neglecting their legal responsibilities under the NPPF paragraphs 115 and 116, the CROW Act 2000 Section 85, and the North Wessex Downs AONB's statutory Management Plan 2009-2014 that the VWHDC is a partner of.

Key Issues affecting the North Wessex Downs AONB:

- **Expansion of the main urban areas just outside the AONB creating urban fringe pressures on the boundaries of the AONB.**
- New large free-standing houses as replacement dwellings in open countryside and insensitive farm diversification activities and associated signage.
- **Unsympathetic incremental expansion of the settlements of and adjacent to the AONB, detracting from the surrounding countryside.**
- **Potential for major development to intrude onto open downland, including masts, pylons, major wind turbine developments, and mineral extraction and waste management, threatening the senses of remoteness and tranquillity.**
- The future use of redundant 'brown field' sites within the AONB, especially redundant airfields and military sites (as at Wroughton), and the impact upon landscape.
- **The pressure for new developments at junctions of the M4 and A34.**
- Lack of knowledge about the boundaries of the current pools of tranquillity and dark night skies within the AONB and the implications of light spillage from development in and around the AONB.

This matter is covered in the introduction to the AONB's statutory Management Plan 2009-2014 that the Local Authority, the Vale of White Horse District Council, is a partner of.

The original capacity assessment of the Harwell East Campus, summarised in Appendix 11 of the URS SA report states that (respondents bold):

"SA 8: The landscape study recommends that the site has low landscape capacity and no part of the site is suitable for development. The site is located within the AONB and there is also one Listed Building along the boundary of the site. Core Policies 34 (Landscape), 37 (Design), and 38 (Historic Environment) would apply; however, such a scale of development within the AONB and surrounding a Listed Building would likely lead to significant negative effects in terms of the landscape and historic environment."

Despite this, the VWHDC still proceeded with an unprecedented housing allocation in the North Wessex Downs AONB.

(continue on a separate sheet/expand box if necessary)

The VWHDC then appointed Hankinson Duckett Associates to undertake a landscape and visual appraisal of the land surrounding Harwell Campus, Oxfordshire (Plan HDA 1, September 2014). This report assesses the relative capacity of parcels of land surrounding Harwell Campus to accommodate future residential development. In light of this document, the Vale of White Horse District Council states:

"AONB/Alternatives

□ in re

*Visual Impact Assessment (LVIA) has been prepared to inform the scale and form of the development of land surrounding Harwell Campus to accommodate future residential development the Council commissioned a bespoke Landscape and Visual Impact Assessment (LVIA) for all land parcels around the campus in order to inform the option testing, with a **view to identifying the optimum level of growth at the site that could be achieved without leading to significant negative effects on the AONB.** The LVIA involved assessing the likely effectiveness of mitigation measures, proposing a mitigation strategy and identifying the residual landscape and visual impacts once these measures had been applied the SA assessed the more detailed options for development around Harwell Campus and was informed by the LVIA, 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%20Statement_Final.pdf)

However, the VWHDC is misleading the public by stating that the *"proposed development in the AONB has been significantly reduced"*; 1,400 were allocated to the Harwell East Campus in the Local Plan Part 1 in February 2014, and the updated version still allocates 1,400 houses within the North Wessex Downs AONB to the Harwell Oxford Campus albeit split between two sites on opposite sides of the A4185.

Further to this, it is hard to believe that the unprecedented building of 1,400 homes at a single strategic geographical site in the AONB will not lead to "significant negative effects" on the AONB as stated above. The scale of development alone will lead to adverse effects in terms of both noise and light pollution, tranquillity and remoteness of the AONB, and will further be out of character with the other settlements within the AONB and will significantly adversely change the character of Chilton village.

The LVIA carried out by Hankinson Duckett Associates also fails to assess the cumulative impacts of the proposed developments at the East Harwell Campus, the North Harwell Campus with the full development of the Harwell Oxford Campus itself in terms of environmental impact and the coalescence of the resulting settlement with Chilton. The VWHDC don't appear to have considered these cumulative impacts and the resulting significant adverse effects on the tranquillity and remoteness of the AONB, and the character of the area either, as required by the following legislation:

Directive 85/337/EEC, as amended by Directive 97/11/EC, requires consideration of the direct, indirect, secondary and cumulative impacts of a project. The EIA Directive also requires consideration of the interactions between potential environmental impacts.

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 also requires a description of the likely significant effects of a development which specifically includes the assessment of cumulative effects.

The total cumulative impact of this combined "settlement" on the AONB has been ignored by the VWHDC and thus does not accurately represent the degree of urbanisation that will result from their proposals. The sheer scale of the combined housing and employment sites in itself will lead to 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 report concludes the following (SOURCE: URS Strategic Analysis of the Vale of white Horse Local Plan 2031, Appendix 14).

The Harwell Oxford Campus sites were sub-divided into land parcels A, B, C, D, E, F, G and H. Highlights from the discussion of “significant effects” against each of the SA criteria are quoted below:

*“SA 2: The four options allocate housing and not services or facilities. However, increased local customer base/spending power resulting from the options would benefit local businesses and potentially encourage new economic activity in Harwell/South East Vale. **If a lower growth approach at Harwell Oxford Campus were pursued this could have the benefit of allowing development to occur elsewhere across the district. A wider distribution of growth (and spending power) could be assumed to support services and facilities in the rural areas – particularly those areas in the west of the district – more than by focussing growth at Harwell Oxford Campus.**”*

*“SA 3: All four locations are reasonably well-served in terms of public transport and will benefit from transport improvements through the Science Vale Transport Strategy. The sites would directly contribute towards their funding and would help improve public transport in the south east district. Furthermore, the site is well-located for access to employment opportunities at Harwell Oxford Campus which should help encourage walking and cycling to the site. Other employment opportunities are reasonably nearby too in the Science Vale Enterprise Zone. **The four options would all lead to positive effects by linking housing to employment opportunities; however the scale of development would likely lead to an increase in traffic on local roads. 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.**”*

*“SA 6: **It is noted that a high-growth approach at Harwell Oxford Campus would reduce the amount of development in the remainder of the district. A low-growth approach at Harwell Oxford Campus would require development elsewhere across the district to meet housing targets. On this 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.**”*

*“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 landscape and AONB. Parcels A, B and G are the parcels that are most capable of being mitigated.”*

*“SA 9: **The scale of development at the site would likely generate additional vehicle movements which could lead to potential noise and air impacts locally. The site is in a sensitive location which could have significant effects in terms of tranquillity of the AONB. Parcel B is near the A34 which may act in combination to affect tranquillity;** however 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 as such have the potential to increase light pollution in the AONB. **If it can be assumed that a greater scale of development would likely lead to a greater effect in terms of air, noise and light pollution in the AONB, Option A would be the best performing due to lowest growth and least impact on tranquillity in AONB.**”*

*“SA 11: **The options are all located on greenfield grade 2 agricultural land which is classified as the Best and Most Versatile Land. The Option leading to the least loss of Grade 2 land – Option A – can be said to be the best performing in terms of this objective.**”*

(continue on another sheet)

Rather than advocate building such large numbers of houses within the North Wessex Downs AONB, the URS internal assessment of the Harwell Oxford Sites suggests that a lower housing growth should be attributed to the Harwell Oxford Campus so that economic growth can also be encouraged across the Western Vale, and would be more beneficial in supporting the rural areas.

Given the scale of housing within the south east 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 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 the Didcot area on the basis of speculative job creation within the Science Vale. This brings the housing provision for supporting the Science Vale to $10,320 + 3,300 + 2,330 = 15,950$ dwellings. South Oxfordshire District Council are allocating up to a further 6,300 houses to the Didcot area in order to support the "Science Vale". 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 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.)

In addition, the current Chilton demographic indicates that only approximately 12% of Chilton residents actually work on the Harwell Oxford Campus (SOURCE: Petition against 1,400 homes in the North Wessex Downs AONB handed in by Chilton residents during the Feb 2014 consultation period.), and the URS Strategic Assessment Report, Appendices, Appendix 14, SA3 reports "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".

A Mid-Sussex examiner 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/8952.htm>

"At issue was the fact that three site allocations for housing development fell within the High Weald Area of Outstanding Natural Beauty (AONB) and were not necessarily "deliverable", according to the examiner. They had not been sufficiently justified given the great weight the National Planning Policy Framework attached to the protection of landscape and scenic beauty."

As a result, the Local Plan is unsound.

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Signature:

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Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="6.112"/>	Policy	<input type="text" value="Core Policy 44: Landscape"/>	Proposals Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="text"/>	No	<input type="text" value="X"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="X"/>	No	<input type="text"/>

Please mark as appropriate.

5. 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 6.112: "Landscape encompasses all outdoor space. There are pressures on these landscapes as a result of changes in agricultural practice and the impact of new development for housing and employment. The distinctive landscape of the Vale needs to

be enhanced and protected for the future. There will be opportunities to enhance the landscape particularly in growth areas around Science Vale and elsewhere in the district and the Green Infrastructure Strategy will identify further opportunities for landscape enhancement within the district."

The allocation of the largest substantially greenfield housing site, 1400 homes in total, within any AONB or National Park within the North Wessex Downs AONB is clearly contradictory to Paragraph 6.112 of the Local Plan which states that "The distinctive landscape of the Vale needs to be enhanced and protected for the future".

Paragraph 115 of the NPPF states that:

"Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads."

The VWHDC commissioned a company called URS to carry out sustainability appraisals of potential sites for new housing. Out of eleven sustainability appraisal criteria used by URS only one, Sustainability Appraisal (SA) Objective 8, mentions the AONB; "Would development at the site affect the AONB or its setting?". However, this is grouped along with the following questions: "Would development at the site affect the Green Belt or its setting?", and "What is the landscape capacity of the site to accommodate development?". No "significant weighting" is applied to sites within the AONB in the scoring tables, although URS do talk extensively about the impact on the AONB in the appendices.

As such, SA Objective 8 does not necessarily place greater significance on proposed development sites in the AONB versus the Green Belt, despite the AONB being afforded a higher level of legal protection. Indeed, review of the Strategic Sites Summary Table (Pages 27 – 31) indicate that a number of potential development sites all score the lowest possible "double negative" score with respect to SA Objective 8, including:

- South West Faringdon
- North West East Challow
- North Stanford in the Vale
- Steventon Storage Facility
- Land east of East Hanney
- East Harwell Oxford Campus
- North Radley

However, when reviewing the Strategic Sites Summary Table, it is not possible to ascertain whether any of these sites are partly or wholly located within the North Wessex Downs AONB.

More notable is the fact that the "North West Harwell Oxford Campus" only scored "negative", rather than the lowest score of "double negative", with regards to SA Objective 8, despite being wholly located within the North Wessex Downs AONB.

As a result, no "significant weighting" is applied to sites within the AONB in the scoring tables, (although URS do talk extensively about the impact on the AONB in the appendices).

(continue on a separate sheet/expand box if necessary)

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In order to make the Local Plan sound and legally compliant, the following modifications are necessary:

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Signature:



Date: December 8th 2014

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text" value="6.113"/>	Policy	<input type="text" value="Core Policy 44: Landscape"/>	Proposals Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text" value="X"/>	No	<input type="text"/>
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Paragraph 6.113: "Core Policy 44 will be applied using the most up-to-date landscape studies available from Natural England, the District and County Council, and from the North Wessex Downs AONB Board. These include: National character Areas, Vale of White Horse Landscape Strategy 2006, the

Oxfordshire Wildlife and Landscape Study, Oxfordshire Historic Landscape Characterisation, and documents produced by the North Wessex Downs AONB Board such as the AONB Landscape Character Assessment. Reference should also be made to the Council's Design Guide SPD."

The LANDSCAPE & VISUAL IMPACT ASSESSMENT FOR PROPOSED RESIDENTIAL DEVELOPMENT SITE - EAST HARWELL CONTINGENCY SITE 17, CHILTON ON BEHALF OF NORTH WESSEX DOWNS AREA OF OUTSTANDING NATURAL BEAUTY, WHLANDSCAPE Consultancy Ltd. March 2014 states the following:

"3.3.2 As a result of the moderately deep and fertile soils, the land within the general location has been graded 2 according to the Agricultural Land Classification (ALC), which indicates that the land is of high agricultural quality."

"3.7.6 (*Extracts from*):

Of particular importance to the assessment of the suitability of the site for development are the key management requirements which are as follows:

The overall management objective is to conserve and enhance the quiet, rural character of the Hendred Plain, which provides a transition between the Vale of White Horse and the high downs.....

Particular consideration should be given to the impact of new development on the boundary of the AONB (at Harwell and Wantage) on the character of this part of the North Wessex Downs and views from this area."

"3.8.3 The NPPF is clear about the selection of suitable sites for development and states at paragraph 110: *"In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment."*

"3.8.7 It is also incumbent on the Local Authority to take account of Section 85 of the Countryside and Rights of Way (CROW) Act 2000 which states: *In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty...A relevant authority for the purposes of this section includes.....3(a) Any public body includes a county council, borough council, district council... ."*

"3.9.2 (*Extract from*):

It was identified that there would be extensive local views into the site from the surrounding road and PROW network but that landform and vegetation cover would rapidly reduce these to the northeast and west. **However, there would be extensive long, open views into the site from the scarp and Ridgeway on the high chalk downland to the south. It was also identified that all significant views into the site were likely to be located within the North Wessex Downs AONB.** This is largely as a result of the open arable nature of the site and the gentle south facing slope towards the downland scarp."

(continue on a separate sheet/expand box if necessary)

"4.2.3 Therefore, in the case of residential development at East Harwell it is clearly demonstrated that the development is of a large scale and would be difficult to integrate into AONB landscape **without significant and irreversible changes to the landscape and visual character of the area and the AONB**. Given the factors discussed above, the actual ZVI (that is, with trees and buildings given due consideration) is unlikely to be appreciably different from the theoretical ZVI. Therefore, the calculated ZVI indicates that the development of East Harwell will potentially have a significant impact on the intrinsic natural beauty, character and appearance of the AONB as a whole."

"RECEPTOR: LOCAL LANDSCAPE CHARACTER AREA

It is a comparatively small area but has a very distinct character forming a transition between the high downs and the clay lowlands of the Vale of White Horse. The site forms an important open landscape between the Harwell Campus, Harwell village and urban Didcot.

RECEPTOR: NORTH WESSEX DOWNS AREA OF OUTSTANDING NATURAL BEAUTY

The site falls entirely within the AONB, a high value landscape of high sensitivity. It does not comply with the stated aims of the AONB, AONB guidance and policy, or Vale of White Horse Core Policy 34 relating to the protection of the AONB.

RECEPTOR: STRATEGIC RIGHTS OF WAY

The Icknield Way regional cycle path passes through the site. The Ridgeway National Trail is located a short distance to the south.

Both of these strategic rights of way are of high value and are located within open landscapes of high value. The characteristics of The Icknield Way will change from open landscape to urban through the development of the site. The Ridgeway will not be directly affected, but there will be an indirect urbanisation of the landscape context in which the route is located.

5.2 SUMMARY OF LANDSCAPE IMPACTS

5.2.1 (Extract from):

The site is a characteristic of the Hendred Plain Landscape Character Area and is entirely within the North Wessex Downs AONB. The proposed development of East Harwell will be out of scale with the small scale developments in the surrounding villages.

5.2.2 (Extract from):

The Icknield Way is a popular cycle route that runs east to west through East Harwell within a highly characteristic open and expansive landscape. Development of the site will result in the loss of the open character and the route running through an urban area.

(continue on a separate sheet/expand box if necessary)

"5.2.2 Overall, the landscape impact of the proposed development will be Major – Major/Moderate Negative. In landscape terms, the potential residential development of East Harwell will have significant and irreversible Negative Impacts. **This conclusion is commensurate with the findings of the Vale of White Horse District Council Landscape Capacity Study.**"

"6.4 The above disregards the Significant Negative impacts identified with a major development in the AONB. In the justification, there is nothing more than a 'consideration' that the benefits of providing housing next to the Harwell Campus outweigh the Negative Impacts on the AONB. This is not a structured justification and should not override the AONB designation. The justification makes no reference to the loss of high quality agricultural land, which should also have been taken into consideration. The proposed site fails to comply with Core Policy 34 in that it ignores the AONB Management Plan, Integrated Landscape Character Assessment, and the Oxfordshire Wildlife and Landscape Study. It also disregards the recommendations of their own Landscape Capacity Study which states:

It is recommended that no part of this site is considered further as a contingency site on landscape and visual grounds. The capacity of Site 17 is determined by the need: (1) to avoid impact on views from the AONB, particularly from the Ridgeway footpath; (2) to avoid loss of open character and visual separation between Harwell Campus and Didcot."

Furthermore, little consideration appears to have been given to the flora and fauna of the site, apart from noting that bee-orchids and white helleborine are present (URS SA Report Appendix 14). No mention is made that the site supports skylarks, which have been observed during the breeding season 2014 (April to early August).

Skylarks are presently on the Red List of threatened bird species and are in dramatic decline. The UK population has halved during the 1990s and declined by 75% between 1972 and 1996 (*Figures: RSPB*). They are birds of farmland and open countryside with specific habitat requirements in order to breed successfully. They are not capable of adapting to a developed or residential environment and no amount of mitigating planting schemes can compensate for destruction of natural habitat. Loss of this arable farmland can only have a further detrimental effect upon skylark numbers.

Therefore, the Local Plan does not comply with Paragraph 6.113, or Paragraph 115 of the NPPF and is unsound.

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