
From: kim pringle
Sent: 22 November 2017 14:40
To: Planning Policy Vale
Subject: Fwd: Comments in response to - Local Plan 2031 Part 2 Publicity Period

Dear Planning,

Please find my additional comments on the Local Plan.

My previous comments were submitted on the 14/11/2017, as you will see from the email chain below.

Comment 18:

Failure of SODC to acknowledge application for Tree Protection Order.

Communications have been held with Tim Stringer, Tree Officer at SODC for several months. Tim has been made aware that residents of North Drive wish to apply for Tree Protection Orders, to safeguard the AONB within the Local Plan.

On the 31st October 2017, Tim Stringer advised me, incorrectly, that there were no TPO is current existence at Harwell Campus. The Northern part of Harwell Campus has been protected by TPOs since 1970. Concerningly, Tim Stinger, Tree Officer, was unaware of this.

The National Planning Policy Framework and relevant planning practice guidance, paragraph 010, reference 36-010-20140306, states "It may be expedient to make an Order if the authority believes there is a risk of trees being felled, pruned or damaged in ways which would have a significant impact on the amenity of the area."

The urgency for TPOs has been highlighted in my emails to Tim Stringer, detailing the extensive felling of trees within the proposed area, by the Campus. My emails also detail the Forestry Commissions involvement and their decision to halt any further felling, without prior permission and a license.

Tim Stringer responded to my initial email advising; "It is my preferred option to secure the retention of the trees by means of a TPO but, whilst the application process is in a formative stage, do not wish to add a further layer of administration unless I believe the trees are threatened."

I have shared my concerns with Tim; he is not independent in this application and works for the same council who are requesting development in the area.

Following this email, Tim has ignored my request to formally apply for TPO. It is my right as a member of the public to apply for such an order and this has been denied/ignored by SODC.

Further to this - please ensure that it is recorded that I wish to attend all oral examinations.

Kind regards
Kim Pringle

----- Forwarded message -----

From: **kim pringle**

Date: Tue, Nov 14, 2017 at 7:33 PM

From: kim pringle
Sent: 14 November 2017 19:34
To: Planning Policy Vale
Subject: Comments in response to - Local Plan 2031 Part 2 Publicity Period

14/11/2017

Response to the Final Publication:

Comments submitted online & via email

Please find below our comments in response to the Final Publication, in relation to the local plan 2031.

Some of our Objections are duplicated from previous; as they have not been taken into consideration in the Final Publication. Therefore they form part of my objections/comments again.

Comment 1:

A lack of evidence provided by the Council to support development at Harwell Campus in particular impact on the AONB.

- One of the Spatial Strategy's three main strands, is to promote thriving villages and rural communities whilst safeguarding the countryside and village character.
The proposal, still does not demonstrate 'careful management of the Oxford Green Belt'. There are no plans showing the likely placement of the dwellings and/or what AONB will remain. Every report that has been produced has been vague; using 'fancy words' and does not actually provide any detail as to what and how the AONB is going to be interfered with.
- The council has not shown how any development can physically integrate within the North Wessex Downs Area of Outstanding Natural Beauty. It refers to infrastructure and the need of more jobs and housing; but is in no way specific in its keeping and protection of the AONB.
Again, the reports provided do not provide any detail as to what and how the AONB is going to be interfered with, placement of the dwellings and infrastructures.
- The report claims that 'there will be limited detrimental effects on the environment, the landscape and recreational opportunities.' It goes on to say:- "It has been demonstrated that the proposed residential development at Harwell Campus would have setting of the AONB and those limited impacts that have been identified are capable of being successfully mitigated."
This is not evidenced anywhere; there is reference to safeguarding the AONB but no exact plans have been provided, documenting how the AONB will be affected.
The report stated that a high quality landscaping scheme will be completed. This should have been done already, so that the residents and inspector can see the exact proposal and destruction to the AONB.

Comment 2:

A lack of evidence provided by the Council to evidence a live/work environment for employees of the Campus.

- The only survey carried out is the CBRE survey revealed that the *existing Campus organisations* view accommodation costs locally and the lack of flexible (short-term) accommodation as a negative factor that is affecting their ability to attract suitably qualified staff. This report is bias and not independent.
- The council's constant reference to highly sustainable 'live-work-play' community is hugely misleading. No evidence has been provided, proving that employees of the campus are actually going to live in the 1400 houses. Further to this, if the development at Harwell Campus is targeting 'employees', how is this going to support Oxford's housing crisis and provide houses to those in need?

Comment 3:

A lack of exceptional circumstances demonstrated by the Council to allocate this site.

- Following the Local Plan Part 1, the Inspector dismissed development in the AONB and stated there was insufficient evidence to demonstrate the exceptional circumstances. This latest report states that a considerable amount of work has been completed to demonstrate that exceptional circumstances exist. The latest report, still fails to detail exceptional circumstances and has merely expanded on the original reports and claims for a live-work-play community. The Inspector has already removed an allocation at Harwell Campus from the Part 1 plan. No new evidence has been offered that should alter the Inspectors views. No new evidence has been offered, which details 'exceptional circumstances'. The only evidence offered, is to benefit the Campus' employability status; not benefit the housing crisis.
- The report purports that the development of Harwell Science Park, to be recognised as a national and international asset, is an *exceptional circumstance*. This factor is not an exceptional circumstance, it is financial interest to investors and the council's business rates. It will not benefit the community and is in the interest of monetary value to investors and the council only.

The report claims that *not* developing at Harwell Campus, would be detrimental to the local economy. This is a bold statement, which is not supported by the non-independent survey carried out.

Comment 4:

Inadequate sewer network in Harwell and Didcot Area.

- The population of Didcot, according to SODC, is over 30,000 people. An additional 22,760 dwellings will near double the population. The sewage and water pipes within the proposed areas are not sufficient and cannot cope with the existing number of dwellings in the area. Last year, Didcot suffered horrendous flooding in the area and over 40+ homes were evacuated. A review by Thames Water and Laines for Drains at the time, concluded that the existing pipes are not to current building regulations and are unable to cope with the waste/water demand currently on the area.
- The latest report advises that Thames Water are 'examining' the means by which sufficient water can be provided to meet the future needs of the region. This suggests that Thames Water have no concrete plans in place to manage Didcot's drastic population increase. Before any 22,760 dwellings should be agreed, the infrastructure in the area should be improved.
- The sewer systems in North Drive, Harwell; adjacent to Harwell Campus are in poor condition. They were adopted by Thames Water several years ago, but are frequently blocked and over flowing. There is no reference in the report, for consideration to the sewers of existing dwellings at North Drive and the effects of an addition 1400 dwellings to the area.
- In the LLP2, Water Cycle Strategy, Table 3.1 Summary of Phase 1, the report states, "*Didcot, Moor Ditch, Environmental capacity could be a constraint to growth. Water pipes already at capacity.*" I have contacted the Planning Department at SODC and they have confirmed that Moor Ditch in Didcot

has serve watercourse (WwTW discharging into it), which shows deterioration (Pg 62). As a result of this, this would affect environmental capacity in regards to vegetation, animal life, water quality etc. Didcot's water pipes are already at capacity. Removing trees, developing houses and not improving the water ways will equal more flooding.

Comment 5:

A lack of evidence to show that development is in the public interest.

- The council have stated that development is in the public interest. The council cannot speak for the public; the public have spoken and object to such development. The development is in the council's interest, in terms of business rates and Harwell Campus' interest in terms of earning from property sales. This is not reflective of the public's interest and not reflective of the 1000's of objections received.

Comment 6:

The CBRE survey is not independent.

- The CBRE survey revealed that the *existing Campus organisations* view accommodation costs locally and the lack of flexible (*short-term*) accommodation as a negative factor that is affecting their ability to attract suitably qualified staff.
This survey is bias; from existing Campus organisations, who are supporting expansion for financial gain/incentive.

Comment 7:

Development of Harwell Campus will not support Oxford's unmet housing need.

- This latest report states 'the housing proposed will offer a tailored mix of types and tenures to appropriately reflect the unique needs of the Campus.'
How can this targeted development, support *Oxford's unmet housing need*, if it is targeting 'employees'?
- Oxford's unmet housing need is a demand for social housing and affordable housing; not attracting more people to the area from afar; to work at the campus. This will not solve the unmet housing need, for existing people within Oxfordshire.
- The CBRE survey relates to a lack of flexible (short-term) accommodation. The 1400 dwelling are not intended to be flexible or short-term. They are supposedly being built to meet the *quantum of Oxford's unmet housing need*. I don't see how 1400 *short term* dwellings are going to assist with Oxford's unmet housing need.
- The Planning Inspector agrees with this; their Report of the Examination into the Part 1 plan states: "*In reality, it would be all but impossible to determine if a potential occupier of this housing represents a Vale or Oxford housing need*".
- **The National Planning Policy Framework, paragraph 47, states:-**
"*To boost significantly the supply of housing, local planning authorities should...use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...*"

According to the NPPF, the current 'housing need' in Oxfordshire is "*affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)*"

The 1400 houses proposed at Harwell Campus, according to the Council's reports, are to fulfil a live-work-play community; specifically targeting and attempting to attract employees to the Campus. This does not meet the objective of the NPPF.

Comment 8:

The land at Harwell Campus does not currently have planning permission for development:

- Throughout the council reports and face to face meetings with the public, it has been wrongly 'suggested' that the land proposed for residential development at Harwell Campus, is already allocated for business development.

There is no planning permission in place for any of the land at Harwell Campus, in areas of AONB, whether it be for expansion of the Campus itself or for dwellings.

It may be the wish of Harwell Campus to use this land for such purposes, but there is no formal approval / official permission to do so. To refer to the land as 'allocated for development' is misleading the public.

Comment 9:

The Council are influenced by the financial incentive from Harwell Campus.

- The report states that it is in the public's interest to develop at Harwell Campus. I disagree; the development will contribute to the Oxfordshire LEP business rate income. The council's opinion is biased towards financial reward and not that of the best interest of the public. The public will not benefit from the financial gain; only the council and Harwell Campus will.

Comment 10:

Heritage assets will be masked and affected.

- The report claims that the Following:

'New development in the Garden Town will enhance the natural environment'

"The Garden Town will also seek to make effective use of natural resources including energy and water efficiency, as well as exploring opportunities for promoting new technology within developments. Innovative habitat planting and food growing zones will characterise the Garden Town and, in turn, these measures will support quality of life and public health."

At Harwell Campus, an AONB, has its own habitats and support quality of life and public health. It does not make sense to discard natural green spaces and replace with artificial 'green spaces'.

The development at Harwell Campus will not 'conserve and enhance' the natural environment.

Comment 11:

Effect to the North Drive residents and neighbourhood.

- Under the Development Policy 24, it states: - 'Development proposals should be appropriate to their location and should be designed to ensure that the occupiers of new development will not be subject to adverse effects from existing or neighbouring uses.'
- 1400 dwelling in an area, where there are currently on 50 dwelling is not appropriate to the location.
- The report states that any development proposals will need to demonstrate that the settlement's character is retained, and physical and visual separation is maintained between settlements. The area surrounding North Drive is an area of outstanding natural beauty. It is impossible to add 1400 dwelling to this area, without destroying the area's character and bulldozing the AONB. It will also lead to a loss of environmental assets that contribute towards North Drive's local identity and harm the North Wessex Downs Area of Outstanding Natural.

Comment 12:

Harwell Campus is not entirely brownfield site.

- The report refers to Harwell Campus as being majority brownfield. This is not correct. A vast majority of the area is AONB, and current used recreationally by the public. It is open green space that the council intend to build upon.

Comment 13:

Tree Preservation Orders.

- The report claims that there are no Tree Preservation Orders on Harwell Campus. This is untrue; there are TPOs on trees to the south and have been in place since 1970.
An application has been made to protect the remaining trees; following Harwell Campus ruthlessly felling over 50 trees.
- As detailed in my previous objections/comments; the landowners of Harwell Science Park have already shown no regard for the local environment in recent months. Under suspicious circumstances, trees have been removed from land belonging to Harwell Science Park, within meters of local resident's homes.
Harwell Science Park claim that the removal of the trees was following a deliberate poisoning of the trees. The contractor carrying out the felling informed local residents that only one tree had shown any signs of poisoning, but could not confirm this was the case.
More than 20 trees were removed; without consultation with the Forestry Commission. This included the removal of an elm tree, which is an endangered/protected species.
Once made aware, Sam Riley from the Forestry Commission halted proceedings in order to prevent any further trees being removed. Harwell Campus were informed that a lawful permit must be sought before further felling occurred. They also agreed with the Forestry Commission to replant the trees, which they now refuse to do.
- LLP1; The 'Equality and Human Rights Impact Check', which is part of the Local Plan, states that it aims to "*promote positive relations within communities*". Harwell Campus have already demonstrated that they are not willing to do this. They have refused local residents the opportunity to replant in the area, which we have offered to do at their own expense. They have also not provided any true findings of any poisoning, despite requests, and have not been transparent with their actions.
Further to this, residents were told not to remove any of the felled trees from the land, as the Campus had a 'specific use' for them. The trees have been in situ, for over 8 months and are rotting. The Campus have no interest in working with the residents of North Drive and have evidenced this numerous times.

Comment 14:

Climate Change.

- The Local Plan 2 will increase CO2 emissions in the area, increase greenhouse gas emissions and increase vehicles in the area. The Local Plan 2, specifically development of the Harwell Campus, details no management of these problems and no development of diverse renewable energy resources.
According to the Local authority carbon dioxide emissions, DECC, July 2013, Domestic energy consumption and CO2 emissions in South Oxfordshire are higher than the Oxfordshire average.
Developing in this area and removing green land and trees will only increase this. Trees act as a natural pollution filter and removing them will only worsen the CO2 emissions problems that face South Oxfordshire.

Comment 15:

Loss of Biodiversity.

- I have reviewed the SODC Sustainability appraisal report of the South Oxfordshire local plan Preferred options 2. I refer to Table 2 South Oxfordshire's sustainability challenges (pages 20-24).
The report states that Oxfordshire is already facing "*challenges to habitats and species that are leading to continuing biodiversity loss include increasing fragmentation of habitats, a changing climate, and the many demands on our land (biodiversity, food, energy, recreation, and housing) (Oxfordshire's Biodiversity Action Plan, hosted by ONCF)*".

I therefore object on the grounds that the Local Plan 2 will affect biodiversity, within the rural and unspoilt landscape surrounding Harwell Campus. I consider this inappropriate and not in agreement with Oxfordshire's Biodiversity Action Plan.

- I refer to Mr Malcolm Rivett's report; Report on the examination into Vale of White Horse Local Plan 2031: part 1, produced 30 November 2016.

Mr Rivett's stated, *"I understand that the footpaths which bound the north and east sides of site 13 are well-used by residents of Harwell and Chilton villages in particular. Whilst landscaping might substantially obscure views of the dwellings themselves it would also all but eliminate the current, attractive wide, open views from these footpaths across agricultural fields to the Downs beyond. Harm would thus be caused to the landscape of this particular part of the AONB and to the recreational opportunities it currently provides."*

This identical case remains within the Local Plan 2. These concerns have not been alleviated.

Comment 16:

Bats Protected by Law.

- In the UK, bats and their roosts are protected by law whether occupied or not. It is illegal to damage, destroy or disturb any bats or roosts.
Every evening, bats can be seen flying around South Drive, North Drive, and the Harwell Campus.
Development is likely to affect bat foraging and habitats.

Comment 17:

Inaccurate Road Traffic Surveys

- Two road traffic surveys have been carried out at Rowstock Roundabout. Both were carried out during half term and therefore the amount of vehicles on the road are far less. As such this is not an accurate survey of the amount of traffic in the area. The surveys are not in accordance with the Design Manual for Roads and Bridges document TA 22/81.