



**VALE OF WHITE HORSE LOCAL PLAN PART 2
(EXAMINATION)**

MATTER 7 STATEMENT

PYE HOMES LIMITED, Respondent 1022463
JUNE 2018

Vale of White Horse Local Plan Part 2 Examination

MATTER 7: HARWELL CAMPUS

Introduction

- 1.1 Terence O'Rourke submits this statement on behalf of J A Pye (Oxford) Ltd (respondent ref: 1022463). It should be read alongside previous representations to the Vale of White Horse Local Plan 2031 Part 2 Publication Version (submitted 22 November 2017). To note, those representations promoted the allocation of a strategic site at East Hendred, as an alternative to the housing allocation at Harwell Campus which sits within the AONB and includes a significant area of greenfield land. To demonstrate the sustainability, suitability and deliverability of the alternative, at East Hendred, the representations included the following extensive information which remains robust and relevant to these matter statements (which do not seek to duplicate information already submitted at 'publication' stage):

- Covering letter (Westwaddy ADP dated 22 November 2017)
- Representation forms relating to Policy 15a and 15b and paragraphs 22.95 – 22.97 & 2.101 – 2.118 as well as Figure 2.6 and Appendix A regarding the South East Vale Sub Area
- Illustrative Master Plan East Hendred (Westwaddy ADP Ref SK01)
- Delivery Document East Hendred (Westwaddy ADP)
- Transport Appraisal East Hendred (David Tucker Associates 17 November 2017)
- Strategic Landscape Review (Aspect Landscape Planning, Letter dated 21 November 2017)
- Updated Landscape and Visual Appraisal East Hendred (Aspect Landscape Planning Ref November 2017 6302LVA.004)

- 1.2 This document responds to the questions raised under Matter 7: Harwell Campus.

Questions

Q7.1 Is the proposal in the LPP2 to allocate a site for 1,000 dwellings for an Innovation Village at Harwell Campus consistent with the strategy of the LPP1 for the district as a whole and the South East Vale Sub Area?

- 1.3 The strategy of the adopted Local Plan Part 1 (LPP1) focuses economic growth within the South East Vale Sub area (Core Policy 15), to ensure that employment growth is centred on the Enterprise Zone and Science Vale area alongside strategic housing and supporting infrastructure. Harwell Campus is

identified as a strategic employment site within this sub-area, which should be safeguarded for employment uses in accordance with Core Policy 29. Harwell Campus is considered by the Council, relying on its own evidence base, to be critical for achieving the economic aspirations of the district and region.

- 1.4 The evidence base of the LPP1 and emerging Local Plan Part 2 (LPP2) clearly demonstrate the need for, and importance of, the Harwell Campus strategic employment site for regional and national economic development. Significantly, the proposed allocation of 1,000 new dwellings at the Harwell Campus would result in the loss of 37ha of allocated employment land for residential uses (LPP2 Appendix A, page 6).
- 1.5 It is acknowledged that the Council considers that there is an over-provision of employment land at the Harwell Campus and Enterprise Zone, more than is needed to deliver the forecasted job growth across the plan period (SQW Exceptions Report, 2017).
- 1.6 However, this situation is no different from the situation that prevailed through the course of the progression and examination of LPP1. Then, the Planning Inspector conducting the examination in 2016 acknowledged that the draft plan sought to allocate more employment land than was strictly required for the identified forecasted jobs growth across the plan period. Nevertheless, he concluded that this employment land strategy was positively prepared, justified, effective and consistent with national policy – it was sound. In coming to this view, the Inspector made the following observations:
- “Whilst national policy advises against an oversupply of employment land, that in the Vale is primarily of longstanding allocation, not currently available for development but maybe requited beyond the current plan period. Furthermore, much of the allocated employment land is located in the AONB and there is no persuasive evidence to suggest that it is needed, or would be appropriately allocated, for any other use.” (paragraph 77)*
- “An alternative proposal to housing allocation 13 has been put forward, involving the development for housing within the northern part of the Harwell Campus itself. This would be significantly less harmful to the landscape of the AONB than the development of site 13 and would, in part, have the benefit of recycling previously developed land. However, it would involve the development for housing of land recently designated as Enterprise Zone and would reduce the amount of employment land available at the campus. Moreover, and fundamentally, given that the need for housing in the AONB has not been demonstrated I conclude that the exceptional circumstances necessary to approve such a development would also be unlikely to exist.” (paragraph 122)*
- 1.7 Significantly, ‘The Strategic Economic Plan for Oxfordshire’ (OXLEP 2016) identifies that since 2011 employment growth within Oxfordshire has been

much faster than had previously been forecast. It identifies that the economic employment forecasts envisaged growth of just over 15,000 jobs over the period 2011-2014. This compares to actual growth of just over 30,000 jobs, double the rate forecast. It is therefore reasonable to assume that the Harwell Campus will continue to play a key role for achieving the economic aspirations of the region beyond the plan period and should not at this stage, based on the clear evidence, be released from its employment allocation.

- 1.8 Having regard to this context, it is clear that the draft LPP2 and associated evidence base has fundamentally failed to properly and robustly assess the potential impact that the loss of employment land would have with reference to the presumption in favour of sustainable development (NPPF 14) and the first key economic strand/objective.
- 1.9 With specific reference to the question posed, LPP2 fundamentally fails to accord with the economic strategy set out in the LPP1 and, despite a clear 'red flag' to the Council at LPP1 examination state, it has still failed to provide a comprehensive evidence base demonstrating that a departure from LPP1 is justified or sound. Specifically, the Council has not provided the evidence that would be necessary, in order to release the site, demonstrating that there is no prospect of the land at Harwell Campus being needed for employment purposes in the future and that it can be robustly confirmed as being surplus to requirements. Circumstances have only changed in further favour of retaining the site as an employment allocation, LPP1 remain up to date in this respect.
- 1.10 The allocations is without doubt contrary to national policy and the up to date LPP1 and fails the test of soundness.
- 1.11 In conclusion, the allocation for housing has not been positively prepared and is not justified as being the most appropriate strategy when assessed against reasonable alternatives, for the following reasons:
 - It is too early in the development plan period to confirm that employment land within Harwell Campus and the Enterprise Zone is surplus to requirements in the longer term i.e. there is no evidence to suggest that it has no real prospect of being developed for employment uses;
 - Adopted LPP1 Core Policy 6 and Core Policy 29 safeguard the site for employment uses and do not provide for residential uses, draft LPP2 Core Policies 15a and 15b would not be contrary to this adopted policy and would remove employment land from an important strategic employment allocation;
 - Diverting employment land to residential use will prejudice the future growth of Harwell Campus for employment uses, particularly given its location in the

AONB which would represent a significant planning constraint to future major development/expansion in accordance with the NPPF;

- The loss of employment land is at odds with the economic growth strategy put forward by adopted LPP1
- The matter has already been considered at LPP1. LPP2 should not present an opportunity for a second bite at the cherry unless circumstances have changed. Evidentially they have not. The policy is entirely unjustified and contrary to the aims and objectives of sustainable development – the policies are flawed legally¹.

Q7.2 Given the exceptional circumstances and national interest tests in the NPPF for major development in the AONB, is the proposal for an Innovation Village justified by proportionate evidence in principle?

- 1.12 Without doubt the allocation of 1,000 homes in the North Wessex Downs Area of Outstanding Beauty represents major development. AONB is a 'Footnote 9' policy. With reference to NPPF 14 under 'plan-making' the presumption does not apply to development in the AONB, where the NPPF indicated development should be restricted. Great weight should be given to conserving the landscape and scenic beauty of the AONB (NPPF 15). Whilst the NPPF provides not further advice with respect to the plan-making process, it is material that with respect to decision-taking NPPF 16 confirms that,

"Planning permission should be refused for major development in these designated areas except in exceptional circumstance and where it can be demonstrated they are in the public interest."

- 1.13 A number of criteria follow, at NPPF 16, requiring a consideration of the need for development and its impact on the local economy, the scope for development elsewhere (outside the AONB) or meeting the need for the development in some other way, and any detrimental effect on the environment, the landscape and recreational opportunities.
- 1.14 The LPP1 Planning Inspector in 2016 considered a very similar proposal/allocation to that now put forward by the Council in LPP2, albeit for 1,400 dwellings at the Harwell Campus. There is considerable overlap with the currently proposed allocation, particularly as the land located to the north of Icknield Way formed part of the previous proposed LPP1 allocation. In considering the draft allocation, the Inspector (report, dated November 2016) recommended that it be deleted from the LPP1 as it failed to meet the tests set

¹ The Planning and Compulsory Purchase Act imposes a duty on those with plan-making functions to exercise those functions with the objective of contributing to the achievement of sustainable development

out in paragraph 116 on the NPPF. A summary of his observations is set out below:

- *There is little, if any evidence to support the contention that this is essential to the realisation of the employment growth which the plan and the Oxford Strategic Economic Plan (SEP) envisage to take place at Harwell in the period to 2031 (paragraph 115)*
- *There is nothing to suggest that residential accommodation could not be appropriately provided for a short distance from the campus outside of the AONB (paragraph 116)*
- *No convincing evidence to indicate that refusing such development would have an adverse effect on the local economy (paragraph 118)*
- *Nothing to suggest that alternative sites for this housing, outside the AONB but within/close to the Science Vale could not be found if necessary (paragraph 119)*
- *The Inspector (in his report, dated November 2017) recommended that the allocation be deleted as it failed to meet the tests set out in paragraph 116 on the NPPF.*
- *Harm would be caused to landscape of this particular part of the AONB and to recreational opportunities it currently provides (paragraph 120)*
- *An alternative proposal to housing allocation site 13 has been put forward, involving the development of housing within the northern part of the Harwell Campus itself. This would be significantly less harmful to the landscape of the AONB than the development of site 13 and would, in part, have the benefit of recycling previously developed land. However, it would involve the development for housing of land recently designated as Enterprise Zone and would reduce the amount of employment land available at the campus. Moreover, and fundamentally, given that the exceptional circumstances necessary to approve such development would also be unlikely to exist (paragraph 122).*

1.15 Clearly the Inspector was unconvinced that exceptional circumstances existed to justify a large scale residential development at the Harwell Campus and within the North Wessex Downs AONB.

1.16 Circumstances have not changed. There is no new evidence to demonstrate consistency with NPPF 116 and justify that the approach in LPP2 is appropriate and/or sustainable. The only arguments now made appear to be limited to a wholly inadequate re-packaging of the previous arguments. In coming to this

conclusion, we have reviewed the Harwell Campus 'Exceptional Circumstances' Report (October 2017) but consider that it fundamentally fails to provide compelling new evidence. While this report re-affirms that Harwell Campus is one of the largest and most important sites for scientific research, development and innovation in European (which is not disputed), it is absent any clear land use planning rationale which address the explicit requirements of NPPF 116 and implications for the approach required at NPPF 14, including even to address the specific issues raised by the Inspector previously at the LPP1 examination. Exceptional circumstances have not been demonstrated.

- 1.17 In fact, and on the contrary, the only new evidence is that relating to the existence of a deliverable alternative within the same South East Vale Sub Area – that being the site at East Hendred, not far from the Harwell Campus.
- 1.18 The Inspector's comments related to the LPP2 current proposal of locating housing north of the Icknield Way, they expressly considered the matter, they remain valid and material, particularly given that they were published just 18 months ago and no change in circumstances exist to demonstrate that the conclusions, and subsequently adopted development plan (which necessarily – through major modification - excluded the allocation) is now out of date.
- 1.19 In inevitable conclusion, it is considered that LPP2 (as drafted) is unsound in relation to the allocation of 1,000 dwellings at the Harwell Campus, for a range of reasons relating to employment loss and so on but also, with reference to the Government imperative to boost significantly the supply of housing land and meet the OAN, because there is a deliverable alternative located to the north of East Hendred. The East Hendred site is not subject to the same significant constraints that apply to the Harwell Campus, including its biodiversity interest and location in the AONB (see previously submitted representations and reports). Importantly, the East Hendred site is not excluded from the presumption in favour of sustainable development.

Q7.3 Is the use of employment land for the proposed Innovation Village compatible with the long term employment objectives for Harwell Campus and the Enterprise Zone?

- 1.20 The use of a strategic employment site for the 1,000 new homes is not compatible with the long-term employment objectives for Harwell Campus and the Enterprise Zone.
- 1.21 The loss of land safeguarded for employment uses is at odds with the economic growth strategy put forward by adopted LPP1. It is considered too early in the plan period to conclude that employment land within Harwell Campus and the Enterprise Zone is surplus to requirements, and there is no evidence to suggest it has no real prospect of being developed for employment uses in the future.

- 1.22 Diverting employment land to residential use will prejudice the future growth of Harwell Campus for employment uses given its location in the AONB which would represent a significant planning constraint to future major development in accordance with the NPPF.
- 1.23 If there were opportunities, for example, to combine the delivery of residential uses alongside employment uses through one or more mixed-use scheme/s at the Harwell Campus, these could be considered at application stage when the merits of making the most efficient use of previously developed or allocated employment land could be considered in detail, with reference to a detailed review of employment land / economic requirements. Indeed, there could be a positive / permissive policy in LPP2 which could facilitate this, with reference to the necessary tests and evidence base that would be required to justify the proposal (for example in relation to the environmental impacts of the development). This residential element could come forward as a windfall. In this context, the objectives relating to the use of the Harwell Campus could be met whilst the LPP2, through the allocations of the East Hendred site, could be found sound.

Q7.4 Is the proposal for an Innovation Village appropriate when considered against reasonable alternatives (if any) in light of site constraints, infrastructure requirements and potential impacts? Have these been adequately assessed? How would the Innovation Village be delivered and managed in the long term to ensure it meets its objectives? Are the detailed requirements in Core Policy 15b and the site development template requirements – both general and site specific – justified and would provide an appropriate basis for the preparation of a Supplementary Planning Document for the site?

- 1.24 In the context of the above, and previous submissions (including the delivery document submitted) it has not been demonstrated that the Innovation Village proposal is appropriate when considered against the reasonable alternatives. The Council's analysis of the merits of the Harwell Campus site and the alternative sites contained within Topic Paper 2 (Site Selection) and the Sustainability Appraisal is inadequate, flawed and inequitable. The criticisms of both, including through comparison of the way in which the Harwell Campus has been assessed relative to land at East Hendred (for example with reference to landscape impact; 'red carding' the latter and only yellow carding the former, despite the obvious difference in locational terms – the former being within the AONB and the latter being outside the AONB, and the NPPF 115 calling for AONB status to be given 'great weight'), has already been set out in the previous representations and not repeated here. Nevertheless, an alternative Sustainability Appraisal outcome with respect to East Hendred is provided, as an appendix to this representation and in response to Matter 1.

- 1.25 In summary, we disagree, on the basis of the evidence, with the Council's assessment that the Harwell Campus 1000 dwellings allocation would cause no significant negative economic or environmental impacts.
- 1.26 The allocation of land to the north of East Hendred would represent a sound and more appropriate strategy. This site is located approximately 2 miles to the north of Harwell Campus, outside the ANOB and is not subject to the same environmental constraints. It is free of technical obstacle to delivery.
- 1.27 The reasons given by the Council for not allocating the East Hendred site are also addressed in full the representations previously submitted, in November 2017 and again not repeated here. Needless to say, the assessment clearly demonstrates that an allocation at East Hendred site, in replacement to the Harwell Campus, represents the most appropriate strategy.
- 1.28 Our assessment of the submitted Sustainability Appraisal in this respect is contained at Appendix A of this statement.

Q7.5 Are the detailed boundaries of the site justified and supported by proportionate evidence? Is the estimate of site capacity justified? Is the expected timescale for development realistic?

- 1.29 The proposed Harwell Campus allocation comprises both previously developed land and greenfield land within the North Wessex Downs AONB. The evidence base fails to provide a robust justification for releasing a significant area of AONB greenfield land for major residential development, particularly given the reasonable alternative of East Hendred.
- 1.30 In order to progress positively on this issue, we note that there are examples elsewhere in the country where proposals for mixed use developments have been deemed accepted within Enterprise Zones. It is considered that there may be scope to realise the 'Innovation Village' concept/objective through the rationalisation and redevelopment of existing brownfield land, without predetermining or constraining the opportunity through a specific residential allocation in LPP2. This approach could be conveyed in policy, would enable proposals to be rigorously tested via the planning application process and could fall within the windfall allowance. Contrary to the current draft allocation, this alternative approach would not undermine the plan or objectives of sustainable development and would not be unsound.

APPENDIX

Vale of White Horse Local Plan Part 2 Examination

MATTER 1: DUTY TO COOPERATE AND OTHER LEGAL REQUIREMENTS

Introduction

- 1.1 Terence O'Rourke submits this statement on behalf of J A Pye (Oxford) Ltd (respondent ref: 1022463). It should be read alongside previous representations to the Vale of White Horse Local Plan 2031 Part 2 Publication Version (submitted 22 November 2017). To note, those representations promoted the allocation of a strategic site at East Hendred, as an alternative to the housing allocation at Harwell Campus which sits within the AONB and includes a significant area of greenfield land. To demonstrate the sustainability, suitability and deliverability of the alternative, at East Hendred, the representations included the following extensive information which remains robust and relevant to these matter statements (which do not seek to duplicate information already submitted at 'publication' stage):
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 - Updated Landscape and Visual Appraisal East Hendred (Aspect Landscape Planning Ref November 2017 6302LVA.004)
- 1.2 This document responds to the questions raised under Matter 1: Duty to cooperate and other legal requirements. To clarify, this statement focuses on the last part of question 1.8, because the Sustainability Appraisal (SA) does not appropriately test LPP2 against 'reasonable alternatives' relating to the distribution of housing within the South East Vale Sub Area.
- 1.3 Of particular note and concern, all three 'reasonable alternatives' examined in the report include the Harwell Campus allocation, so no alternatives to this allocation are tested.

Question 1.8: Have the likely environmental, social and economic effects of the LPP2 been adequately addressed in the Sustainability Appraisal? Does the appraisal test the plan against reasonable alternatives for the spatial strategy of the plan and the distribution of housing?

Incorrect identification of 'reasonable alternatives'

- 1.4 This position has arisen based on an erroneous assumption by the report's authors. Footnote 15 of paragraph 5.1.7 states that *"there is no requirement to present detailed site options appraisal findings within this report, given that site options are not 'alternatives' where there is no mutually exclusive choice to be made between them."* This reasoning is used to explain why only an informal, narrative appraisal of the large sites is undertaken in appendix IV, with no clear scoring or assessment matrix to support the text. The introduction of appendix IV states that *"The aim of this appendix is to present an informal appraisal of the options"*, while the methodology sections states that *"Within each narrative there is a discussion of sites that perform notably well or notably poorly. The aim is not to systematically discuss each of the 13 larger site options in terms of each of the 12 SA objectives."*
- 1.5 However, it is incorrect to state that there is no mutually exclusive choice made between the options. In the establishment of 'reasonable alternatives' in section 5.6 of the report, the Harwell Campus site is included as a constant in all three 'reasonable alternatives', with the other larger sites in the area excluded in all options to prevent over-allocation within the sub-area. This is clearly a mutually exclusive choice between Harwell Campus and the other larger sites, including land north of East Hendred. This means that the site options must be seen as 'reasonable alternatives' and be subjected to detailed assessment in line with the requirements of the SEA Regulations, which has not been carried out.
- 1.6 This error means that the approach taken in the report does not accord with the requirements of the SEA Regulations in relation to the treatment of alternatives, as clarified by case law, in two key ways.

Reasons for the rejection of alternatives

- 1.7 Firstly, the SA report does not provide clear reasons, supported by evidence, as to why the land north of East Hendred site (among others) was not taken forward as a 'reasonable alternative'. The judgement on the *Save Historic Newmarket Ltd v Forest Heath District Council* case confirmed that an environmental (or SA) report must provide *"an accurate picture of what reasonable alternatives there are and why they are not considered to be the best option"* and that prior ruling out of alternatives could take place *"subject to the important proviso that reasons have been given for the rejection of the alternatives, that those reasons are still valid if there has been any change in the proposals in the draft plan or any other material change of circumstances and that the consultees are able, whether by reference to the part of the earlier assessment giving the reasons or by summary of those reasons or, if necessary by repeating them, to know from the assessment accompanying the draft plan what those reasons are."*
- 1.8 The land north of East Hendred site is only mentioned in two (heritage and landscape) of the 12 objectives discussed in appendix IV. This clearly does not indicate that the

site performs “*notably poorly*” and provides no justification for not testing it as a ‘reasonable alternative’ to the Harwell Campus allocation. Similarly, table B ‘summary appraisal findings’ at the end of the appendix merely states for land north of East Hendred that it is “*Located within the Science Vale, although more limited potential to walk/cycle to employment locations than some other locations. Comprises land that has low capacity for development from a landscape perspective.*” It should be noted that the site was not raised as performing relatively poorly for walking/cycling under the ‘movement’ objective assessment. This summary provides no clear evidence or justification for not taking land north of East Hendred through as a ‘reasonable alternative’.

- 1.9 Box 6.11 ‘unreasonable options’ gives “*explicit consideration...to some other options considered, but ultimately discounted as ‘unreasonable’.*” This states that removal of the Harwell Campus allocation is considered unreasonable because it “*represents a unique opportunity that should be capitalised upon now, recognising Science Vale objectives.*” Merely stating that the Harwell Campus allocation is considered to be a ‘unique opportunity’ does not provide adequate evidence-based reasons as to why it would be unreasonable to replace this allocation with a different site, such as land north of East Hendred.
- 1.10 Meanwhile, paragraph 6.5.11 merely states that the land north of East Hendred site is subject to constraints and would not contribute to Science Vale objectives to the same extent as the Harwell Campus site, but no evidence or assessment is provided in appendix IV to support these statements. As mentioned above, land north of East Hendred is not even mentioned in 10 of the 12 narrative assessments against the SA objectives, so it is not possible to compare its performance objectively with that of the Harwell Campus site. This clearly shows that sufficient reasons have not been provided to justify the rejection of land north of East Hendred as a ‘reasonable alternative’ to the Harwell Campus.

Equal examination of alternatives

- 1.11 Secondly, the various sites have not been assessed at the same level of detail. The judgement on the Heard v Broadland District Council case stated that “*the aim of the directive, which may affect which alternatives it is reasonable to select, is more obviously met by, and it is best interpreted as requiring, an equal examination of the alternatives which it is reasonable to select for examination alongside whatever, even at the outset, may be the preferred option.*” This requirement has not been met by the SA report.
- 1.12 Appendix IV does not provide evidence that the appraisal of the larger sites was undertaken at the same level of detail for all the sites. Land north of East Hendred is only mentioned in two of the 12 objectives, so it is not possible to determine its performance against the other 10 objectives. In contrast, the Harwell Campus site is mentioned in seven of the 12 objectives. For it to be clear that all sites have been

equally examined, information on each site should be provided for every objective, except where there is no difference in performance between all the sites. A clear scoring or assessment matrix with an accompanying commentary on each site's performance against each objective should be provided to demonstrate that each site has been examined equally.

- 1.13 In addition, paragraph 6.5.11 states that detailed discussions have been carried out between the Council, the Campus, developers and stakeholders in relation to the Harwell Campus site (particularly in relation to the avoidance/mitigation of AONB impacts). This is used as a justification for making this site a constant in the three 'reasonable alternatives' and thereby making it the preferred option over the other larger sites in the South East Vale Sub Area. No evidence is provided that similar discussions were held in relation to the other large sites, which were dismissed as being "*associated with constraints*". This demonstrates that an additional level of detail was taken into account to address the constraints associated with the Harwell Campus site, most notably its location within the AONB, which was not allowed for the other sites. The consideration of the sites' relative merits/constraints and the exclusion of the other larger sites in favour of Harwell Campus as the 'preferred option' was clearly not undertaken based on an equal examination of the alternatives.

Comparison of the Harwell Campus and land north of East Hendred site/s

- 1.14 A comparison of the performance of the Harwell Campus and land north of East Hendred sites against the SA objectives has been carried out (see table 1), based on the assessment information provided in the SA report, the council's Topic Paper 2: Site Selection and the representations on the local plan submitted on behalf of J A Pye Oxford Ltd on 22 November 2017. It uses the red / amber / green classifications applied in the site selection report and to the assessment of 'reasonable alternatives' in the SA report. However, rather than using '=' and no colouring to show where the options perform on a par, as was the case in the SA report, a colour classification is still applied in line with the approach taken in the site selection report so that the overall performance of the sites against the SA objectives can be understood.
- 1.15 This comparison shows that the land north of East Hendred site performs as well as the Harwell Campus site against several objectives and better than the Harwell Campus site against a number of key objectives, including those relating to landscape, the natural environment and heritage. This demonstrates that the land north of East Hendred site is a 'reasonable alternative' to the Harwell Campus site and should have been assessed as such through the SA process.

SA objective	Harwell Campus	Land north of East Hendred
Homes	Can provide 1,000 dwellings. Can also provide housing for employees directly on campus	Can provide 1,000 dwellings. Only two miles from the campus and could also meet housing need for campus employees
Services and facilities	Can provide a primary school on site. Would contribute towards secondary school and healthcare provision	Can provide a primary school on site. Would contribute towards secondary school and healthcare provision
Movement	Will provide homes close to jobs and allow people to walk to work. Will provide scope for improved bus services. National Cycle Route 544 passes through the site. New north-facing slip roads at Chilton Interchange will provide alternative point of access onto the A34 and new Harwell Link Road will provide an alternative route to Didcot	Will provide scope for improvements to bus services and nearby cycleways. The site is only two miles from Harwell Campus and close to other key employment areas. While there will be some additional vehicles at the Milton Interchange, off-site improvements to existing infrastructure will be implemented and the new Harwell Link Road will provide an alternative route to Didcot*
	Possible need identified for reconfigured and/or new access junctions along the A4185 and surface upgrades to Hungerford Road (byway) between the junction with Icknield Way and the A4130. The latter would lead to significant effects on the AONB and on recreational users of the byway. Two new road accesses may be required across the Icknield Way, which would have detrimental landscape and recreational effects*	Development will require new accesses, but there are capacity concerns at Rowstock Roundabout and along Featherbed Lane. These could be addressed by improvements to the roundabout and localised widening along Featherbed Lane*
Health	Access to greenspace – site has excellent access to the AONB, with the Icknield Way long distance path passing through the site and the Ridgeway National Trail nearby	Access to greenspace – site has excellent access to the AONB and wider countryside, with the Vale Way long distance path running along the northern edge and other public rights of way running through the site
Inequality and exclusion	Can provide affordable housing. Not sufficiently close to deprived areas to support regeneration	Can provide affordable housing. Not sufficiently close to deprived areas to support regeneration
Economy	Development will support the campus by providing housing for employees on site	Site is only two miles from the campus, so could also support the campus by providing housing for employees. No employment land will be lost to development
	Development will lead to loss of land allocated for employment use, including part of the area designated as an Enterprise Zone*	
Natural environment	Site is identified as being of local biodiversity value, but surveys of the site found two plant species of principal importance that are on the IUCN Red List. The parts of the site where these species are found merit designation as a county wildlife site. The site contains numerous mature trees and the south west part is identified as deciduous woodland priority habitat. Common lizard and bats were also recorded on site*	Much of the site is of low ecological interest because it is intensive arable farmland with few hedgerows. East Hendred Brook is a locally important wildlife corridor and there is evidence of water vole. Development could enhance the brook by replacing the arable land with new habitats and enhancing the habitats along the brook, including by widening the corridor to create new wetland areas*

SA objective	Harwell Campus	Land north of East Hendred
Heritage	Site is within an area of known archaeological potential and the Icknield Way, part of an ancient route that has a claim to be the oldest road in Britain, runs through the site*	Site is within an area of known archaeological potential. East Hendred conservation area lies to the south but will not be affected and the site is screened from the Ridgeway National Trail*
Landscape	Site lies within the AONB. It is partly brownfield. Development will need to be relatively high density for a site within the AONB and will affect views from routes such as the Icknield Way and Hungerford Road bridleway. It is also likely to lead to substantial removal of trees *	The AONB lies to the south of the site, but site is not within the AONB. Very little of the site is visible from the AONB and it will be screened by the existing village, new development already approved north of the A417 and landscape buffers further west. There are few footpaths in the area to the north between the railway line and Hanney Road. Extensive landscape planting will be provided on site*. There will be a change to the site's landscape character
Pollution	Road noise from A4185, lighting and noise from employment uses, and contaminated land on site, but can all be mitigated. No power lines on site	Road noise from A417, and power lines on site, but can be mitigated*. No contamination on site
Climate change mitigation	Will increase emissions from traffic	Will increase emissions from traffic
	Will provide scope for improved bus services, encouraging sustainable travel. Location on the campus will reduce travel to work. Provision of more than 500 dwellings makes decentralised heat and power a possibility	Will provide scope for improved bus services, encouraging sustainable travel. Provision of more than 500 dwellings makes decentralised heat and power a possibility
Climate change adaptation	Site is in flood zone 1	Development area is in flood zone 1* and drains to Didcot WWTW
	Significant infrastructure for wastewater facilities will be required alongside growth at campus. Site is partly brownfield but will lead to loss of some grade 2 agricultural land	Development will lead to the loss of grade 2 agricultural land
Table 1: Assessment of the Harwell Campus and land north of East Hendred sites against the SA objectives		

*The assessment in the SA or site selection report has been revised based on information provided in the submitted local plan representations. Please see the representations for further details.

Conclusions

- 1.16 The SA does not appropriately test the plan against 'reasonable alternatives' for the distribution of housing within the South East Vale Sub Area. The approach taken to the assessment of alternatives does not accord with the requirements of the SEA Regulations, as it fails to provide reasons for the rejection of alternatives and does not provide an equal examination of 'reasonable alternatives'.
- 1.17 The land north of East Hendred site clearly represents a 'reasonable alternative' to the Harwell Campus site and should be examined as such through the SA process.