



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

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.

Title

Dr

First Name

James

Last Name

Wickens

Job Title (where relevant)

Organisation representing
(where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

2. Agent's Details (if applicable)

Sharing your details: please see page 3

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

2.98

Policy

Policies Map

2.6

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

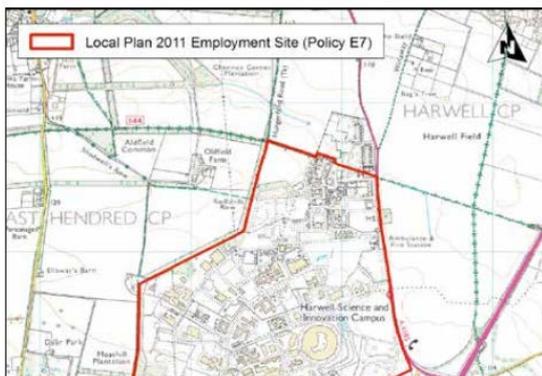
Yes

No

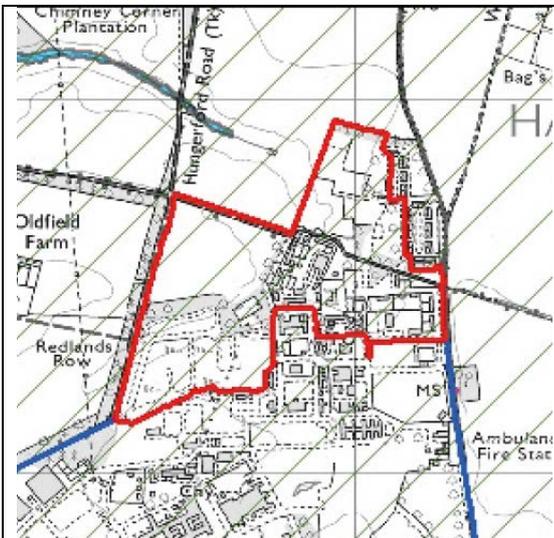
5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to Cooperate, please also use this box to set out your comments.

The sixth bullet point of paragraph 2.98 states “The land proposed for development at Harwell Campus is already allocated for development...” This statement completely ignores the fact that the land proposed for employment development in local plan part 1 (Adopted Local Plan Part 1: Strategic Sites and Policies Appendices, Appendix C: Sites for Milton Park and Harwell Campus, Figure C2 (page 59)) goes no further north than Ickneild Way:



Whereas the northern border of the proposed housing development (Local Plan 2031, Part 2, Details policies and Additional Sites, page 53 figure 2.6) does go beyond Ickneild Way:



The statement that “The land proposed for development at Harwell Campus is already allocated for development...” is therefore false and deceptive.

This makes the proposal UNSOUND because some of the land proposed for housing is not already allocated for development and represents a completely new proposal to build housing on AONB land. Such a proposal was rejected by the planning inspectorate in The Inspector’s report on LLP1 (point 118: “I therefore conclude that, on the basis of the evidence put before the examination, the need for a “work-live-play community” at Harwell, and thus housing on sites 12 and 13 within the AONB, has not been demonstrated.” and point 121: “In summary the need for development of sites 12 and 13 for housing has not been demonstrated and, having regard to the potential for mitigation, it would be likely to cause some harm to the landscape of the AONB and the recreational opportunities it offers.)

The Vale of White Horse planning department have FAILED TO COMPLY WITH THEIR DUTY TO COOPERATE in this matter. On the 2nd of May 2017 I sent Comments on Local plan 2031 part 2 to the planning department using their comment form. My comments consisted of 6 points, the first point was as I have described here. In the council’s responses to comments (Local plan 2031 part 2, consultation statement appendix 3 – summary of consultation responses), the council included the later 5 responses but did not even acknowledge the first. I contacted the council planning department on the 8th of November 2017 to ask them why my first comment was not included in the consultation statement but received no reply. It is difficult for me to think of a reason for the council’s behaviour on this point other than to conclude that they are trying to bury this border change and hope nobody notices.

Further, I suspect that on the point I have mentioned, the planning department may NOT BE LEAGALLY COMPLIANT. The only way in which I can rationalise why the planning department have moved the boundary under discussion here is this: The employment zone in Local plan part 1 (see first map above) represents parts of Harwell Campus that are most readily developed for commercial/employment use (relatively flat with good access), the area to the north of Icknield Way is more undulating with worse access but is still owned and maintained by Harwell campus management. By allocating the area to housing, Harwell campus management can sell land that does not have commercial value and dispense with land for which they pay to maintain. If this is the case, I believe that the proposed housing will be more in-line the commercial interests of Harwell campus management than the principles of good planning. I am not a legal expert so I cannot comment if this is an illicit action, but I would consider it unethical.

(Continue on page 4 /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 matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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.

The border of any proposed housing on this site must be redrawn so as to match that previously allocated for development. Additionally, the council should reveal any and all communications with Harwell Campus management so that the exact nature of any discussions are available for scrutiny. The reduction of the proposed area for housing may also call into question the viability of the whole housing development.

(Continue on page 4 /expand box if necessary)

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 hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

J Wickens

Date:

21/Nov/2017

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a

Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

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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

2.95
+2.98

Policy

Policies Map

2.6

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The council states that “Exceptional Circumstances” exist to justify development within the AONB (point 2.95) but does not give any significant additional reasons beyond those in the local plan part 1 that were rejected in the planning inspectors report. In that report it is stated that “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 Oxfordshire Strategic Economic Plan (SEP)” (Vale of White Horse Local Plan 2031: Part 1, Inspector’s Report November 2016). Furthermore the council’s assertion that there is a need for housing on campus (point 2.92) is directly contradicted by the fact that there are several houses on South drive that Harwell Campus Partnership have been content to leave empty. How can there be a desperate need for accommodation on campus when Harwell campus Partnership own houses on Campus that they choose not to house people in? Please note that the houses on South drive have not been occupied for some time, but they are not derelict and could be made habitable with minimal effort.

The “innovation village” is mirage intended to obscure the fact that there is no good reason to build this housing in an ANOB. The Council states in Section 2.98, first bullet point, that “The development of an ‘innovation village’ offering a highly sustainable ‘live-work-play’ community is considered essential to unlock the potential of the campus” and goes on to state that “The housing proposed will offer a tailored mix of types and tenures to appropriately reflect the unique needs of the Campus” but makes no commitment to tying accommodation to employment on campus. At a planning meeting on 20th of March a council representative reiterated that the proposed accommodation would not be allocated to those employed on Harwell Campus. If not tied to working on Harwell campus the proposed housing simply becomes part of the Vale’s general housing stock and negate all of the councils claims to “exceptional circumstances” for a housing development in the AONB.

Further to that point, if the proposed housing is not tied to employment on campus and instead becomes part of the Vale's general housing stock, there will be a significant increase in the pressure on the local roads. The roundabout at Rowstock is already a bottle neck and additional traffic travelling from the proposed housing to Milton, Wantage and Grove will only serve to create a logjam. This junction is already a significant danger for cyclists. Putting hundreds of commuters on the roads around this employment zone at rush hour can only harm the environment, the well-being of the majority of Campus employees and the performance of Harwell Campus as an Employment Zone.

(Continue on page 4 /expand box if necessary)

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The planning department have not demonstrated that there are "exceptional reasons" for the housing proposed for north of Harwell campus, their assertion that it does is obtuse, unsound and represents a failure to cooperate. Therefore the inspector previous determination that such a development is unwarranted stands. The Plan should respect that decision and remove the proposed housing to the north of Harwell campus.

(Continue on page 4 /expand box if necessary)

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The planning department are not being frank when they describe this proposed development as an “innovation village”. Very high density housing (>50 dwellings per hectare) on a site previously used treat radioactive waste should be called what it is: A slum.

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