

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dr James Vincent
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Q1 Do you consider the Local Plan is Legally Compliant? Yes

Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified) No

If your comment(s) relate to a specific site within a core policy please select this from the drop down list. N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? Yes

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to 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:

- 1 South West Faringdon
- 2 North West East Challow
- 3 North Stanford in the Vale
- 4 Steventon Storage Facility
- 5 Land east of East Hanney
- 6 East Harwell Oxford Campus
- 7 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).

Summary: The allocation of the largest 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?.

Q5 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 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, the following modifications are necessary:

- 1 Remove the entire allocation of 850 homes from the Harwell East Campus.
- 2 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)).
- 3 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.
- 4 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:
 - 1 (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
 - 2 (b) Didcot A (capacity for 425 houses), or
 - 3 (c) Land West of Steventon (capacity for 350 houses), or
 - 4 (d) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district.
- 1 Or reduce the total SHMA allocation for the District by 1000
- 1 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.

Q6 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