

Date: 19 December 2014
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Vale of White Horse Council

BY EMAIL ONLY

T [REDACTED]

Dear Sir/Madam,

Vale of White Horse The Local Plan 2031 Part One: Strategic Sites and Policies final publication November 2014

1. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.
2. Many thanks for the above consultation. We have a number of comments to make on this plan. Our principal concern relates to the landscape impact of two proposed allocations (allocations 12 and 13) on the North Wessex Downs Area of Outstanding Natural Beauty (AONB), as highlighted in our past formal consultation responses to the Local Plan Part 1 (our ref: 79995, May 2013, and 113500, April 2014). Natural England advises that on the basis of the information presented the policies relating to these sites are unsound in that they are not justified as being the most suitable locations for development at this scale when considered against reasonable alternatives. Our reasoning is set out below.

Landscape and sustainability assessment of the Harwell Campus sites

3. Whilst we note and welcome the additional landscape assessment work that the Council has undertaken to understand the landscape capacity of the allocations associated with the Harwell campus, we disagree with the conclusion that:

12.4.2 'The mitigation strategy would screen the majority of the views of the development at maturity (20 years). The character within the Option 2 land would change, but the overall character of Parcel 1 would be consistent with the landscape character of the wider landscape to the west of the campus. 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.'
4. This conclusion underpins the Sustainability Appraisal (SA) site assessment (para 13.3.3 of SA report/p, 177 of SA Appendix), namely that the preferred option has a 'minor negative landscape impact'. We disagree with this conclusion and advise that allocating these sites will result in a major adverse effect on the AONB on the grounds that the scale of development (1400 dwellings), in combination with the presence of the existing Harwell Research facility, would have the effect of bringing the urban influence of Didcot, and beyond, to the foot of the down. The scale of development will be of particular significance to people using the Ridgeway National Trail (NT) and surrounding public rights of way network. Further detailed reasoning on the landscape impacts is set out in Annex 1.
5. Given the significance of this landscape designation, which is reinforced by para 115 of the NPPF that 'great weight' be attached to it, Natural England does not consider the evidence outlined in the SA to be sufficiently robust to justify the scale of impact of 1400 homes. As such, the

evidence presented undermines the sites assessments for allocations 12 and 13 and on this basis Natural England advises that it fails to meet the justified test of soundness.

6. Further detailed comments on the site selection aspects of the SA can be found in Annex 2.

Other concerns regarding site appraisals

7. Paragraph 116 of NPPF advises in relation to AONBs 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.*

8. It is not Natural England's role to advise on the merits of the case in relation to the need for development at this location, nor on alternative development solutions, the first two of the bullet points in paragraph 116. However, it is important for us to take into account these matters insofar as they set the context for our own advice. In this respect we find the scoring of alternative allocation options within the Sustainability Appraisal to be unclear. We have thus made a number of detailed comments relating to the site selection aspects of the Sustainability Appraisal are found in Annex two of this letter.

Appraisal of alternative approaches

9. The vision for the Local Plan (page 29) outlines that new residential and economic growth will be focussed on the Science Vale area. This overall vision for the area filters down to the preferred strategic approach (Option G) and the implementation of a Ring Fence Policy (Core Policy 5), which outlines that the Science Vale Area will be treated as a separate sub-area with a housing requirement of 11,850 homes in the plan period. By focussing development to a particular location, a significant part of which is of high environmental sensitivity, we are concerned that reasonable alternatives are limited. This is of increased concern following the increase in the housing target to approximately 20,560 homes. Whilst the original vision and strategic approach may have been reasonable under a lower housing growth scenario, we are concerned that with higher housing numbers in this locality, the environmental limits will be reached with regard to impacts on the AONB. We would wish to see clear justification that all reasonable alternatives have been considered and this may include a reassessment of the overall strategy to establish whether more appropriate sites are located outside the AONB to deliver all or part of this quantum of development.
10. In Natural England's opinion when housing numbers were substantially increased, the proposed distribution should have been reappraised, given the environment constraints of the area. Topic paper 2 Spatial Strategy (2014) outlines under Para 3.46 that the up to date Strategic Housing Market Assessment (SHMA), published in 2014, formed the basis for the housing target for the Vale of White Horse Local Plan. As a result of the SHMA the housing target was increased in comparison to earlier versions of the Plan and as a result more strategic site allocations were added. It goes on to state that 'the approach overall is considered highly consistent with the spatial strategy and no further work has been carried out to refine the strategy further.' Additional strategic sites were considered in the context of their conformity with the spatial strategy. Taking this into consideration, Natural England advises that further explanation is required to justify the approach taken considering it directly resulted in further housing proposed
11. In addition to the points above, our April 2014 letter (Ref 113500) stated the following: *We are also concerned that if it has been judged that the distribution of housing is the most sustainable to meet identified need within the plan area, whether the option of seeking to meet the need outside of the plan area has been sufficiently explored. This option does not appear to have*

been tested within the Sustainability Appraisal and Natural England would welcome clarification as to whether such an option has been discussed with neighbouring authorities through the duty to cooperate. This matter has not been clarified in the Duty to Cooperate Topic Paper and therefore this concern still stands.

12. Finally (with respect to Appraisal of alternative approaches), in arriving at its conclusion that option G is the preferred option, the SA says;

11.8.5 In-light of updated information (from the 2014 SHMA), the Council's preferred option is now Option G. This approach partially reflects SA findings in that Option G was appraised to lead to the most beneficial socio-economic effects; but there were potential significant 'environmental' effects that could potentially be overcome with detailed design and development management policies.

13. As discussed elsewhere in this response, we advise that even with mitigation, significant 'environmental' effects remain. Given the significance of this landscape designation, which is reinforced by para 115 of the NPPF that 'great weight' be attached to it, Natural England does not consider the evidence outlined in the SA to be sufficiently robust. As such, the evidence presented undermines the assessments of alternative approaches and the approach is justified and hence unsound.
14. This is perhaps illustrated by noting that Option B delivers approximately the same quanta of development, and scored similarly (one less major positive and one less major negative) to Option G. They both scored the same for their landscape impact (major negative). Given the great weight to be attached to the AONB designation, and our views on the landscape impact of the Harwell Campus allocations, we suggest there is a clear difference to be drawn in terms of the landscape impacts of these options, which is not reflected in the SA.

Consequential development

15. The existing Harwell Campus is in essence an employment site, not an existing community. Should these allocations be adopted, we are very concerned that their presence will result in consequential development in future plan periods.

New sites

16. The proposed Core Policy 44 says that the key features that contribute to the nature and quality of the Vale of White Horse District's landscape will be protected from harmful development. Leaving Harwell Campus allocations aside, there are a number of allocations which do not concur with the recommendations of the Landscape Capacity Studies undertaken, and as such are unsound insofar as are not compatible with Core Policy 44 (landscape): "*The key features that contribute to the nature and quality of the Vale of White Horse District's landscape will be protected from harmful development and where possible enhanced*". The ones we have identified are:
 17. **Land south of East Hanney.** This new allocation was assessed in the Phase 1 Landscape Assessment Of Eight Additional Contingency Housing Sites. The conclusion with respect to this site was that the site was only suitable for very small scale housing next to Summertown and that development elsewhere would result in harm to the wider landscape, the settlement pattern and its landscape setting, and in a visual impact on the southern approach to East Hanney.
 18. **East of Kingston Bagpuize with Southmoor.** The Phase 1 Landscape Assessment Of Eight Additional Contingency Housing Sites said that this site had some potential for development subject to more detailed study. It is unclear whether such a study has been undertaken and thus how much development can be provided for here. In the absence of such a study we advise that the allocation is not justified.
 19. **North of Shrivenham.** The Landscape Capacity Study says that the capacity for this site is for some 400 dwellings, while some 500 have been allocated.
 20. The expanded North of Shrivenham site now adjoins Tuckmill Meadows SSSI. We are concerned that development here will have an adverse impact on the SSSI due to recreational and hydrological effects.

21. In terms of recreational effects we are confident that recreational effects can be managed by way of mitigation, but advise that to be sound this needs to be covered in the development requirement, which should be amended as follows: “Contribute towards redressing the identified Green Infrastructure deficit in the area surrounding Shrivenham, and ensure there is no recreational impact on Tuckmill Meadows SSSI”.
22. In terms of hydrological effects, we are not confident that it will be possible to Demonstrate that development will not affect the hydrological systems which feed into the Tuckmill Meadows Site of Special Scientific Interest (SSSI), and consequently we advise that there is no certainty that the policy is deliverable. Additional evidence is needed to show that this policy and thus the plan as a whole is deliverable and thus sound.

Development site templates.

23. In our previous response we advised “the Council makes particular reference in the development templates to retaining the attractiveness of the public rights of way running through or adjacent to the various allocations.” We note that the development templates say “Connect to existing footpaths, cycleways and public rights of way (PROW) wherever possible to enhance pedestrian permeability and connectivity. Safeguard PROW.” We are still concerned that the quality of public rights of way running through or adjacent to the various allocations will not be maintained in line with NPPF 75. We advise that to address this matter, the text should be amended to read “Connect to existing footpaths, cycleways and public rights of way (PROW) wherever possible to enhance pedestrian permeability and connectivity. Safeguard PROW and ensure that any loss of quality is offset by measures to enhance the network elsewhere.”

Other matters

24. CP46. The Sustainability Appraisal (appendices p188) advises that stringent policies should be set out in the Local Plan to ensure: ...Net gain in biodiversity – particularly targeting farmland birds. We thus advise that particular emphasis is put on targeting farmland birds in the text supporting this policy, so as to ensure the plan is effective.
25. To be effective we advise one small change of wording in CP46. The policy should read: “...measures can be provided (and are secured...)”.
26. **Appendix H: Monitoring and Implementation Framework.** The landscape indicators should include developments which detrimentally affect AONBs, i.e. exclude ones within which do not have a detrimental impact, and include ones outside of the designated area which do have a detrimental impact.
27. In general terms the indicators and targets (with respect to landscape, green infrastructure and biodiversity) appear to be vague, difficult to measure, and in some cases not directly related to the effects of the plan. For example, it is not clear how measuring “permissions and developments within designated AONB areas” (output presumably a number per annum) would allow one to ascertain whether the two targets (*Developments would not conflict with the aims of conservation and enhancement of AONB* and *Locally valued features are protected, maintained and where possible, enhanced*) had been met.
28. **Infrastructure Delivery Plan (IDP).** We note that the IDP makes reference to GI as a subset of leisure. While there is an intersection between these areas, there are aspects of GI which perform little if any leisure function. We suggest it would be clearer if the IDP section heading was retitled Leisure and Green infrastructure in line with para 10.4 of the IDP.

Habitats Regulations Assessment

29. Having reviewed the February 2014 Habitats Regulation Assessment update, we concur with the conclusions as set out in section 9, with the exception of the point Oxford Meadows SAC as set out below.
30. We note that the HRA states (para 8.6);

It is considered likely that housing across Oxfordshire will result in an increase in nitrogen deposition and NOx concentration within a small part of the Oxford Meadows

SAC as it lies adjacent to the A34 and A40. Although Vale of the White Horse contribution to nitrogen deposition will be small enough to be trivial, its contribution to changes in NOx concentrations will be small but greater than trivial. As such the Oxfordshire authorities are undertaking more detailed studies to investigate air quality within the SAC adjacent to the A34 and A40, which will in turn inform specific mitigation interventions. As a precaution, until that study is completed, it has been assumed in this analysis that an air quality effect may exist and appropriate plan-level measures to address the issue (as accepted for other local authorities) have been identified and are reflected in the Local Plan Part 1 which would enable a conclusion of no adverse effect to be reached (as has been the case in the Thames Basin Heaths area) and enable the Local Plan Part 1 to be adopted. One further recommendation related to monitoring has been included in this report for incorporation into the Plan.

31. This conclusion differs from the conclusion of the recently completed Habitats Regulation Assessment of the Cherwell Local Plan which (as we understand it) assessed the same in-combination growth. This stated that the HRA Stage 1 (Screening) identified that none of the 76 policies (or the proposals therein) present in the Cherwell District Council Submission Cherwell Local Plan incorporating Proposed Modifications (August 2014) would lead to likely significant effects on Oxford Meadows SAC, alone or in combination with other plans and projects. Natural England concurred with the conclusion of this Habitats Regulations Assessment.
32. We advise that the Council seeks to reconcile the Habitats Regulations Assessment of their plan with that of Cherwell.

Conclusion

33. Whilst we have raised a number of concerns in this response, our primary one relates to the plan's impacts on the North Wessex Downs AONB both in terms of the impact of allocating sites at Harwell Campus, and the strategy which lead to these allocations.
34. We would welcome the opportunity to meet with the Council to discuss our concerns and look for areas of common ground prior to the examination of the plan.

For any correspondence or queries relating to this consultation only, please contact [REDACTED]
[REDACTED]
[REDACTED]

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely
Charles Routh

Lead Adviser,
On Behalf of Thames Valley Team, Natural England.

Annex 1 – Detailed comments on the Harwell Campus landscape study

Summary

Natural England's principal concerns are on the likely impact on the landscape character, special qualities and natural/scenic beauty of the North Wessex Downs (NWD) Area of Outstanding Natural Beauty (AONB) and visual receptors (people) using The Ridgeway National Trail (NT) and surrounding public rights of way network.

Legislative Framework

AONBs, alongside National Parks, are the nation's finest landscapes. Their statutory purpose is to enhance and conserve the natural beauty of these places. Section 85(1) of the Countryside and Rights of Way Act 2000 requires all persons holding public office, public bodies and Ministers of the Crown, when exercising or performing any functions so as to affect land in an AONB to *"have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty"*. Section 92(2) of the Countryside and Right of Way Act 2000, this includes having regard for conserving its fauna, flora and geological and physiographical features.

Section 84(4) local planning authorities are required to take such action as appears to them to be expedient for the accomplishment of the purpose of conserving and enhancing the natural beauty and amenity of an AONB to the extent that it lies within their area.

Natural England has a duty to give advice where any Minister or local authority consults it about proposals for development of land or the preparation of any development plan in an AONB (by section 84(1)(a) – (b)). This includes proposals located outside, but affecting the enjoyment or natural beauty of, an AONB. The NPPF affords these places the highest protection. Paragraphs 109, 115 and 116 of the NPPF read as follows:

"109. The planning system should contribute to and enhance the natural and local environment by: Protecting and enhancing valued landscapes"

"115. 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."

"116. 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 recreation*

Natural England's Advice

Natural England advises that the allocation of housing sites 12 and 13 at the Harwell Campus site (totalling 1,400 dwellings) will adversely affect the special qualities of the AONB, particularly given the location of the proposed development sites, which can be viewed from numerous locations along the Ridgeway NT. Although mitigation measures will reduce the scale and extent of the likely impact it will have a resulting change in landscape character.

North Wessex Downs AONB Management Plan 2014 – 2019 provides a description of the landscape character of this part of the designation and the special qualities of this landscape which help to define it's natural beauty. These sections are reproduced below (NE emphasis is underlined).

Landscape Special Qualities Section 3.3 (p.24):

- The distinctive northern **Downs Plain and Scarp** plunges down from the chalk plain to the Vale of White Horse, creating a dramatic recognisable horizon.

Downs Plain and Scape Landscape Type (p.20):

The landscape of the Downs Plain and Scarp extends along the entire length of the northern boundary of the North Wessex Downs. The plain is formed by the eroded surface of the Lower Chalk, creating a low level surface extending as a wide ledge at the foot of the high Open Downland. The distinctive northern scarp plunges down from the chalk plain to the Vale of White Horse, creating a dramatic recognisable horizon when viewed from the north. This area is characterised by some of the most emblematic features of the North Wessex Downs: the Ridgeway, the oldest road in England – running along the top of the scarp; the Uffington White Horse on the scarp face; and Avebury on the open Downs Plain, forming part of the Stonehenge and Avebury World Heritage Site. The Downs Plain is characterised by vast arable fields, lack of surface water and a general absence of settlement. Conversely the dramatic scarp slope, cut by springs, creates a convoluted edge alternately under woodland and pasture, including significant areas of remnant chalk grassland. This is a landscape that feels as though it has hardly changed over the centuries, although it is increasingly affected by development at its foot, outside the AONB boundary.

The key issues for the Plan period will be ensuring that development beyond the boundary does not visually damage these critical scarp landscapes; management of users of the Ridgeway to maximise enjoyment and minimise conflicts; and maintenance and, where possible, extension of the chalk grassland habitats. A major ambition is to enhance prominent views of and within the area by reconnecting fragmented remaining grassland along the length of these chalk ridges. Much former grassland has been ploughed or overtaken by scrub and secondary woodland. Priorities include arable reversion, scrub clearance and reintroduction of grazing, carefully targeted to restore key views.

Natural England's Assessment of the landscape and impact upon Landscape Character and Visual Receptors.

Following site visits on the 12th May 2014 and 24th November 2014 Natural England observations on the landscape baseline for the area and our assessment of the impact of the scheme (without mitigation measures) on the landscape character and visual receptors using The Ridgeway NT are as follows:

Landscape Baseline

This part of the NWD AONB can be characterised as an open chalk downland landscape sloping down, to the north, to The Vale of the White Horse and to the north east, to the Thames Valley. Views to the north of the Ridgeway NT incorporate the distant horizon of the Vale of the White Horse and Cotswold Hills (to the north) and Thames Valley and Chiltern Hills (to the north east). This is an open landscape where views to far horizons are a key component of character and are reflected in the special qualities of the NWD AONB. The influence of the built environment on landscape character is centred around Didcot Power Station, particularly the cooling towers and turbine halls, as well as the town of Didcot itself particularly the industrial buildings on the southern edge of the town. Beyond Didcot Abingdon and Oxford can be glimpsed. In the fore ground the Harwell Research Facility is a conspicuous and distinctive feature which is partly screened by belts of mature trees and well established hedgerows. Otherwise this landscape is predominately rural in nature with a mixed arable farming land use. Tree cover is sparse although shelter belts are notable feature to the northwest (towards East Hendred). There is evidence that new hedgerow (re) planting has taken place in the within the past 10 -15 years.

Impact on Landscape Character

The allocations, in combination with the presence of the existing Harwell Research facility would have the effect of bringing the urban influence of Didcot, and beyond, to the foot of the down. This combined, with the new development planned for the south of Didcot, and would form a new feature in the existing landscape which would be of a scale to change landscape character in a way contrary to the purpose of the AONB designation. This effect would be particularly pronounced when seen from the car park located on the Ridgeway NT to the west of the lane leading from the A34 southwards towards West Ilsley. This view can be contrasted with the character of the landscape when viewed from the car park located to the east of this lane. Here the character of the landscape is dominated by purely rural features which stretch from the top of the down and extends all the way to the Chiltern Hills top the

north east. The sense of connection to this wider landscape and far horizon is particularly strong when experienced from this location.

Impact on Visual Receptors

Users of the Ridgeway NT are considered to have a very high sensitivity and as such would be particularly attune to the change in landscape character brought about by the site allocation. We are concerned that there are likely to be sequential effects i.e. repeating views of the allocated site along the NT extending over a considerable distance we estimate this would be for some 3km (or a circa 40 minutes walk) although without a zone of visual influence map this is hard to ascertain. Natural England advises that the scale of the allocation site, the repeating sighting of the development would be sufficient to adversely affect these users and limit their enjoyment of the recreational opportunity offered by the National Trail. Users of the extensive network of public rights of way which pass through the site and surrounding landscape will also be affected.

Natural England Advice on the likely effect of mitigation measures

It is our advice that mitigation of the landscape and visual impacts will be unable to reduce the impact of the allocations to acceptable levels when the wider landscape setting of the allocation site is considered. This is due to:

- The prominent sloping nature of the site (in particular the way the site presents itself to the open down land to the south) and the scale of development proposed leading to unacceptable landscape and visual impacts as seen from key viewpoints e.g. 1, 4, 5 and 6 in the Harwell Campus Landscape Study document and numerous locations along the Ridgeway NT.
- The landscape mitigation proposed in the landscape study is anticipated to reach the modelled height at 20 years. There is obviously a significant period of time over which the visual impact (from key viewpoints e.g. 1, 4, 5 and 6 etc.) will be largely unmitigated while the vegetation is still short. Unless the mitigation planting could be established considerably in advance of the impacts arising, we advise that the time lag alone is sufficient to render the mitigation ineffective.
- The residual visual impact as viewed at maturity from key viewpoints e.g. 1, 4, 5 and 6 etc. At maturity some of the development would still be visible as illustrated in the landscape study. It is likely that this could be addressed by additional planting. However, significant visual impacts will still arise from the mitigation planting, changing the character of the landscape from open farmland one where large blocks of wood would be a defining feature.
- The impact upon visual receptors, in particular users of the Ridgeway NT and the public rights of way which pass through the sites. Both appear to be very well used public rights of way. Users will have their immediate surroundings and (for site 13) views southwards radically impacted both pre and post mitigation.

Comments on adequacy the Harwell Campus Landscape Assessment

Although described as a landscape and visual appraisal (para 1.1.1) (and variously as a landscape and visual impact assessment report and as a landscape study), the assessment only considered the visual impact of the allocations, and did not consider the landscape impact per se. The allocation sites contain many of the characteristic landscape features of this portion of the AONB, namely large open arable fields, crossed by open, un-bordered historic track ways, albeit influenced by neighbouring built development. These allocations will permanently and fundamentally change the landscape character of this part of the AONB.

We note that para 12.4.2 of the landscape study says (referring to option 2 i.e. areas A, B and G, but can largely be applied to the preferred option) *the character within the [option] would change, but the overall character [of Parcel 1, now site 13] would be consistent with the landscape character of the wider landscape to the west of the campus. 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.* We disagree with this conclusion for the reasons set out above and do not see how such changes would be compatible with the AONB management Plan 2014 – 2019.

Finally we note that no attempt has been made to consider how the allocation sites would affect the special qualities of the NWD AONB in part of the designation.

Annex 2 – Detailed comments on the Sustainability Appraisal

We advised in our April 2014 response that additional evidence or reasoning should be produced to support the assertion that the allocation at Harwell Campus will have significant positive economic and transport impacts in earlier responses, both to meet the needs of the Sustainability Appraisal, but more particularly to meet the major development test in the NPPF (116).

In terms of the major development test in para 116 on the NPPF the Sustainability Appraisal states:

Further Justification

- 13.3.4 Two of the proposed sites (East and North of Harwell Campus) are located within the North Wessex Downs AONB. Paragraph 116 of the NPPF states that planning permission for major developments in the AONB should be refused except in 'exceptional circumstances' and where it can be demonstrated they are in the public interest.
- 13.3.5 Harwell Campus is an existing and well established development within the North Wessex Downs AONB. 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.
- 13.3.6 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

It is not readily apparent from the SA what the *impact of permitting it, or refusing it, upon the local economy*. The Harwell Campus site's importance does not in and of itself provide uniquely exceptional circumstances to justify supporting further development.

The Sustainability Appraisal (appendix p176/177) does say (of allocating housing at Harwell Campus on the economy):

All options are considered to result in significant positive effects for the Vale's economy, towns and rural areas. Through delivering housing adjacent to the nationally significant Science Vale UK Enterprise Zone, this would help increase the attractiveness of the area for prospective businesses and employers due to the availability of high quality and affordable housing in the vicinity for employees.

However, we suggest that this level of information falls short of being an assessment in terms of NPPF para 116, and we query the relationship between distance of housing and the attractiveness of the area for prospective businesses and employers due to the availability of high quality and affordable housing in the vicinity for employees. While there is a prima facie reason to believe that there is a positive relationship, it is unclear as to the scale of the benefit, and how that benefit changes with distance from the employment site, and thus the weight to be attributed to the benefit.

The Sustainability Appraisal says at para 13.3.2 that all four Options were appraised to result in significant positive effects in terms of meeting housing needs and the Vale's economy.

We have queried the economic impact above. We also query the significant positive effects in terms of meeting housing needs. The SA justifies this in appendix p.175 (re allocating housing at Harwell Campus on the housing objective):

All options would lead to significant positive effects in terms of this objective through delivering a large number of new homes in a suitable location with good accessibility to employment opportunities at Harwell Oxford Campus and other Market Towns in the south east of the district. All four options would help to deliver affordable housing in an expensive part of the district.

To state they are in suitable location prejudices the matter in hand, namely the assessment of whether the site is suitable. We suggest that the matter of access to employment opportunities is a matter to be considered under the transport objective, not housing. Finally, we query whether assessing this objective against how many houses the site can deliver is appropriate, prejudicing the assessment in favour of

larger sites. Indeed if this method was appropriate, it would be more transparent to state what housing numbers were required to achieve a given score.

We also note that the original Sustainability Appraisal for this site assessed the site as significantly positive for transport. This has now been reduced to minor positive, for the reasons set out in the SA appendix p.175. This reduces the appropriateness of this site in comparison to the earlier assessment.

Site appraisal of specific alternative sites.

We note that a number of allocations have been dropped or had numbers reduced from the plan since the February 2014 consultation. Excluding the reduction at Harwell Campus, these appear to total some 2600 dwellings, including 1000 in the (revised) South East vale sub area, at a site (Milton Heights) less than 5km from the Harwell Campus with minimal if any impact on the AONB. Whilst it is not our role to promote alternative sites, in terms of the major development test, it would appear that there are alternatives which were deemed viable in the February 2014 consultation, which would cater for the bulk of the allocation at Harwell Campus. We note that Milton Heights was reduced due to an objection from Oxfordshire County Council (OCC) on highway grounds, but there has been no discussion as to how fundamental that objection is compared to the “great weight” consideration due to the AONB. Further explanation on this issue would be welcomed.