

	<b>Vale of White Horse Local Plan Part One: Strategic Sites and Policies</b> Publication Stage Representation Form	Ref:  (For official use only)
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Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.

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*		2. Agent's Details (if applicable)
<i>*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.</i>		
Title	Mrs	
First Name	Caroline	
Last Name	Lidd	
Job Title	Housewife	
(where relevant)		
Organisation		
(where relevant)		
Address Line 1	Downs house	

Line 2	Lower road	
Line 3	Chilton	
Line 4	Didcot	
Post Code	Ox110rr	
Telephone Number		
E-mail Address		
(where relevant)		

## Part B – Please use a separate sheet for each representation

Name or Organisation : C S Liddle

3. To which part of the Local Plan does this representation relate?

Paragraph	Policy	Proposals Map
1.25 NPPF states "plan should be most appropriate strategy when considered against the alternatives"	Core Policy 4: Meeting our housing need	

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*Please mark as appropriate.*

5. 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.

The VWHDC have chosen to allocate two housing developments within the North Wessex Downs AONB, despite there being viable alternative sites out with the AONB, thus failing to comply with the NPPF paragraph 116 which states 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.”

There are several alternative sites that accommodate the required numbers of houses within the Science Vale without having to build in the AONB. They are:

1. Didcot A: Total Site Capacity up to 425 houses at 25 dwellings/hectare
2. Rowstock: Total Site Capacity up to 1,000 houses at 25 dwellings/hectare
3. Valley Park: Total Site Capacity for up to an additional 1,200 houses
4. Site 47, Land West of Steventon: Total Site Capacity up to 1,175 houses at 25 dwellings/hectare

Analysis of these sites indicates that, on landscape grounds, Didcot A can accommodate 425 dwellings, Rowstock up to 515 dwellings, Valley Park an additional 1,200 dwellings, and the Land West of Steventon up to 350 dwellings. Therefore, there is plenty of scope to reallocate the 1,400 houses from the AONB to alternative, viable sites. (SOURCE: Local Plan 2013 Part 1 Strategic Sites and Policies, Appendix 5 Site Information Tables.)

Appendix 9 of the URS Strategic Assessment of the Vale of White Horse Local Plan 2031 Part 1: Appendices concluded, with respect to 10 sites considered with long term potential, that ***“In terms of the best-performing site options, these are considered to be sites at Valley Park, Didcot A, North West Grove, and Rowstock. They have no significant constraints and would lead to various positive effects, particularly in terms of housing, reducing the need to travel and the local economy, through good access to employment sites and town centres”.***

Currently Didcot A, Rowstock and the Land West of Steventon have no housing allocation.

Therefore, the decision to allocate 1,400 houses the majority on greenfield land in the North Wessex Downs AONB, the largest greenfield allocation in any National Park or AONB in the UK, is not the most appropriate when considered against the alternatives, and is therefore unsound.

The Harwell-Oxford Campus is a long established development dating back to 1946 and was a feature of the AONB when the later was set up in 1972. It is unsound to use its presence as justification for further

6. 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 at 5 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 and legally compliant, the following modifications are necessary:

- Remove the entire allocation of 850 homes from the Harwell East Campus.
- Remove the additional allocation of 150 homes on greenfield land from the North West Harwell Campus (eg reduce the number of houses from 550 to 400).
- Include provision of up to 400 new homes (including the 125 already given outline approval) at the North West Harwell Campus, provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
- 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:
  - (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
  - (b) Didcot A (capacity for 425 houses), or
  - (c) Rowstock (capacity for 515 houses), or
  - (d) Land West of Steventon (capacity for 350 houses), or
  - (e) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district
- Or reduce the total SHMA allocation for the District by 1000 houses
- 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.

These steps will make the Local Plan compliant with the NPPF paragraphs 115 and 116, and make the Local Plan compliant with the CRoW Act 2000.

***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?

X

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

Signature:

Date:

16/12/2014

## Part B – Please use a separate sheet for each representation

Name or Organisation : C S Liddle

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*Please mark as appropriate.*

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Proposed use of Local Development Orders (LDOs) to speed up delivery on sites, including potentially the Harwell Oxford Campus.

The Harwell Oxford Campus is located entirely within the North Wessex Downs Area of Outstanding Natural

Beauty. Although the campus itself established in 1946 is regarded as a brownfield site, any new development within the boundary of the site should still take into account its setting within the North Wessex Downs AONB and the impact it will have on the setting, particularly in terms of visual impacts, noise and light pollution.

Therefore, the appropriateness of using an LDO to speed up the delivery of commercial buildings within the North Wessex Downs AONB has got to be questioned.

(continue on a separate sheet/expand box if necessary)

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Planning laws that take the setting of the North Wessex Downs AONB should still be maintained with regards to development within the Harwell Oxford Campus, and an LDO for the site should not be adopted. A key feature of the Campus and one that gives it an important differentiation from Milton Park is its rural location and this must be retained.

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16/12/2014

## Part B – Please use a separate sheet for each representation

Name or Organisation : C S Liddle

3. To which part of the Local Plan does this representation relate?

Paragraph	2.14	Policy	Core Policy 4: Meeting our Housing Need	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Paragraph 2.14 states that “the high quality and rural nature of the Vale is borne out by the many designations that cover the district, including AONB, and that it is important that development protects and maintains the special characteristics of the built and natural environment”.

The allocation of two sites in the North Wessex Downs AONB of 850 and 550 houses respectively do not help protect and maintain the special qualities of the AONB.

Instead, this allocation is the single largest strategic housing allocation within a mainly greenfield site in any AONB or National Park to date. Indeed, even the allocation of 850 houses alone represents the largest strategic housing allocation on a greenfield site in any AONB or National Park in the UK. (SOURCE: North Wessex Downs AONB Management Board).

Furthermore, such an unprecedented housing allocation within the North Wessex Downs AONB will have significant negative impacts on the landscape and environment as confirmed by URS who state that, with regards to the East Harwell Campus site (SOURCE: URS SA Report, Appendix 11):

- **SA 8: The landscape study recommends that the site has low landscape capacity and no part of the site is suitable for development.** The site is located within the AONB and there is also one Listed Building along the boundary of the site. Core Policies 34 (Landscape), 37 (Design), and 38 (Historic Environment) would apply; **however, such a scale of development within the AONB and surrounding a Listed Building would likely lead to significant negative effects in terms of the landscape and historic environment particularly in relation to important views, natural features, tranquillity and noise and light pollution.** As part of design and mitigation measures, development at this site within AONB should contribute towards the objectives of the AONB Management Plan; Integrated Landscape Character Assessment and the Oxfordshire Wildlife and Landscape Study.
- SA 9: The site is adjacent to the A34 which could lead to increased traffic (and associated air, noise and light pollution), as well as amenity effects for residents nearest the road. **The site is in a sensitive location within the AONB which could have significant negative effects in terms of tranquillity of the AONB.** Relevant Core Policies 29 (Promoting Sustainable Transport and Accessibility) and 33 (Natural Resources) would apply to reduce the significance of pollution impacts; **however given the sensitivity of the AONB this is likely to remain a significant adverse effect.**

If these large scale housing developments within the AONB are permitted, there will be significant consequences for all AONBs, National Parks and the Norfolk Broads.

The special characteristics of the natural environment are not being protected; there is clear non-compliance with paragraphs 115 and 116 of the NPPF, the CROW Act 2000 Section 85, and Core policy 44: Landscape. Therefore the plan is unsound.

(continue on a separate sheet/expand box if

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In order to make the Local Plan sound and legally compliant, the following modifications are necessary:

- Remove the entire allocation of 850 homes from the Harwell East Campus.
- Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of houses from 550 to 400 n.b. the 400 includes the 125 already given outline permission).
- Include provision of up to 400( including the 125 already given outline permission)new homes at the North West Harwell Campus, provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
- 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:
  - (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
  - (b) Didcot A (capacity for 425 houses), or
  - (c) Rowstock (capacity for 515 houses), or
  - (d) Land West of Steventon (capacity for 350 houses), or
  - (e) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district.
- Or reduce the total SHMA allocation for the District by 1000 houses
- 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.

These steps will make the Local Plan compliant with the NPPF paragraphs 115 and 116, and make the Local Plan compliant with the CRoW Act 2000.

***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.***

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Signature:

Date:

16/12/2014

## Part B – Please use a separate sheet for each representation

Name or Organisation : C S Liddle

3. To which part of the Local Plan does this representation relate?

Paragraph	4.3	Policy	Core Policy 3: Settlement Hierarchy	Proposals Map	Figure 4.2
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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*Please mark as appropriate.*

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The Harwell Oxford Campus is repeatedly and consistently referred to as a "Larger Village" throughout the Local Plan. This is misleading, as it is an employment site with only a small number of houses within its perimeter.

The Harwell Oxford Campus describes itself as follows: ***“Harwell Oxford is a 710 acre science, innovation and business campus based in South Oxfordshire”***. (Harwell-Oxford website: <http://www.harwelloxford.com/>)

The Campus is on private land with numerous signs posted around the perimeter of the campus stating that ***“Private Land. This land is the private property of the United Kingdom Atomic Energy Authority and has not been designated as a Public Right of Way”***

The VWHDC Plan uses the basis of speculative potential employment opportunities at the Harwell Oxford Campus employment site as a justification to build 1400 of houses adjacent to the site and entirely within the North Wessex Downs AONB. This building would result in the creation of a new “Larger Village” or “Small Town”.

Paragraph 4.3 also fails to mention that a significant proportion of the South East Vale is within the North Wessex Downs AONB, including the Harwell Oxford Campus which lies entirely within the North Wessex Downs AONB.

As a result, the designation of the Harwell Oxford Campus as a “larger village” is misleading, and therefore unsound.

(continue on a separate sheet/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 test you have identified at 5 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.

Redesignate the Harwell Oxford Campus as an employment site, and not a larger village.

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Signature:

Date:

16/12/2014

## Part B – Please use a separate sheet for each representation

Name or Organisation : C S Liddle

3. To which part of the Local Plan does this representation relate?

Paragraph	4.7	Policy	Core Policy 3: Settlement Hierarchy	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*Please mark as appropriate.*

5. 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.  
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Chilton has been designated as a “*Smaller Village*” and is defined as a village with a low level of services and facilities, where any development should be modest and proportionate in scale and primarily be to meet local needs.”

Chilton has increased in size by ~80% with the completion of 275 new houses at Chilton Field by Autumn 2014. This is a substantial increase in housing for a "Smaller Village".

The proposal by the VWHDC to build a further 850 houses at the East Harwell Oxford Campus will place a further 425 houses in Chilton, bringing the total number of houses in Chilton to  $365+275+425=1065$ . This represents a further 66% increase in the number of dwellings compared to the 625 houses that currently form Chilton village, and a circa 300% increase in the number of houses compared to the original Chilton village with ~365 dwellings.

Further to this, the position of the additional 275 houses in Chilton has been omitted from all maps in the Local Plan, and is therefore misleading in terms of housing provision within the AONB, and housing provision close to the Harwell Oxford Campus. It is important to note that these houses were built on a brownfield site that was prior to the development within the perimeter of the Harwell-Oxford Campus.

Moreover, the failure to include the additional 275 houses on the strategic site maps makes it more difficult to assess the true extent of urban sprawl into the AONB, and must be considered in terms of the cumulative impact further developments may have on the sensitivity of the AONB and change its character forever

Therefore, the plan to continually expand the smaller village of Chilton, within the legally protected landscape of the North Wessex Downs AONB, does not comply with Paragraph 4.7, making the plan unsound.

(continue on a separate sheet/expand box if necessary)

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Remove the East Harwell Campus housing allocation for 850 houses, entirely within the North Wessex Downs AONB, and comply with recommendations that Smaller Villages, such as Chilton, should only be considered for development that is in keeping with local character, is proportionate in scale and meet local housing needs. In order to make the Local Plan sound and legally compliant with NPPF paragraphs 115 and 116, and the CROW Act 2000, the following modifications are necessary:

- Remove the entire allocation of 850 homes from the Harwell East Campus.
- 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)).
- Include provision of up to 400( including the 125 already given outline permission) new homes at the North West Harwell Campus, provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
- 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:
  - (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
  - (b) Didcot A (capacity for 425 houses), or
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  - (e) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district.
- Or reduce the total SHMA allocation for the District by 1000 houses
- Remove the North Wessex Downs AONB entirely from the Science Vale "Ringfence" in order to protect it from future speculative

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Signature:

Date:

16/12/2014

## Part B – Please use a separate sheet for each representation

Name or Organisation : C S Liddle

3. To which part of the Local Plan does this representation relate?

Paragraph	4.17	Policy	Core Policy 5: Housing Supply Ring fence	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Paragraph 4.17 states that the “Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment” by SQW and Cambridge Econometrics February 2014 indicates that around 15,850, or ~70%, of the 23,000 new jobs forecast for the district to 2031 are likely to

be located in the Science Vale Area. To clarify, this means that the Vale expect up to 15,850 new jobs to be created within the South East Vale covering the area from Wantage and Grove in the West to the outskirts of Didcot in the East, and from Sutton Courtenay in the North to Chilton in the South.

In the "Further Justification" for building at the Harwell Oxford Campus is the statement "It is estimated that at least 5,400 net additional jobs will be created at the campus." (SOURCE: URS SA Report Final Paragraph 13.3.5).

The aforementioned document by SQW/Cambridge Econometrics clearly states, in relation to the UK Science Vale Enterprise Zone, that:

*"In total therefore, we estimate that the increase in jobs above trend could be as follows: 5,400 net at Harwell and Milton Park, primarily in the Enterprise Zone (EZ) but also on other land at Harwell".*

Cambridge Econometrics then clarifies that the split between the Harwell Oxford Campus and Milton Park would mean that up to 3,500 net jobs could be created at the Harwell Oxford Campus in the time period to 2031.

However, it is important to distinguish between the total number of jobs at an employment site, and the net number of new jobs that are expected to be created.

A further net 5,400 figure for the Harwell Oxford Campus is quoted by the SQW/Cambridge Econometrics Report, but only in so far as it states that "There is scope for considerable further development at Harwell beyond the EZ " (SOURCE: Cambridge Econometrics Report, page 19 and Table 4.1). Therefore the land at Harwell Oxford Campus, including the land outside the EZ, has the potential capacity to accommodate up to net 5,400 new jobs.

The projected job figures appear to come from a simple area of land divided by the land required per employee calculation at a jobs/floor space density of 24 (SOURCE: SQW/ Cambridge Econometrics, Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment, February 2014, Table K.4: Employment sites and jobs in Vale of White Horse, page 117).

Therefore, the net 5,400 number for the Harwell Oxford Campus actually represents a job capacity for the site, not the projected number of new jobs. The Harwell-Oxford Campus has never pursued a policy of speculative development so any housing development should be under their control if it is to match employment growth

**The SQW/ Cambridge Econometrics report still concludes that 3,500 net new jobs have the potential to be created at the Harwell Oxford Campus in the time period to 2031.**

As a result the further justification for building at the

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In order to make the Local Plan sound and legally compliant, and protect the North Wessex Downs AONB, the following modifications are necessary:

- Remove the entire allocation of 850 homes from the Harwell East Campus.
- 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)).
- Include provision of up to 400( including the 125 already given outline permission) new homes at the North West Harwell Campus, provided that all development is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
- 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:
  - (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
  - (b) Didcot A (capacity for 425 houses), or
  - (c) Rowstock (capacity for 515 houses), or
  - (d) Land West of Steventon (capacity for 350 houses), or
  - (e) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district.
- Or reduce the total SHMA allocation for the District by 1000
- 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.

These steps will make the Local Plan compliant with the NPPF paragraphs 115 and 116, and make the Local Plan compliant with the CReW Act 2000.

***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?

X

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

Signature:

Date:

16/12/2014

Signature:  Date:

































