

## Comment

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<b>Comment by</b>	Mrs Nicola Livingstone
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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.**

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. Valley Park: Total Site Capacity for up to an additional 1,200 houses 3. 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, 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, 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 development outside its boundaries. Summary: The plan to place 1400 new houses on an elevated area of the North Wessex Area of Outstanding Natural Beauty (AONB) without full consideration of possible alternative sites is in conflict with the obligations placed on the District Council by the National Planning Policy Framework " DCLG (2012), paragraphs 115 and 116 and the Countryside and Rights of Way Act of 2000 and is unsound.

**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 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) Land West of Steventon (capacity for 350 houses), or \* (d) 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.