

## Comment

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Comment by	Dr Patrick Moseley
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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 4.43 states that infrastructure delivery is important to ensure new development is sustainable, particularly across the science vale. This is where ~70% of projected jobs and 75% of strategic housing is allocated.

Essential highway infrastructure has been identified to support the identified growth across the Science Vale. Most of the identified improvements are to improve current roads via resurfacing or improving visibility, however the essential highway infrastructure does not address the capacity issues surrounding the A34, nor is there any flexibility within the Local Plan to relocate housing elsewhere if the transport network within the Science Vale fails or leads to nothing but gridlock.

The A34 has already been identified as a barrier to growth for the Science Vale. The SQW report states that Begbroke and Oxford will compete for the same business as Harwell Oxford Campus, and that the A34 is a major barrier to growth: (SOURCE: [http://www.sqw.co.uk/files/2613/8690/7243/Oxford\\_engine.pdf](http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf))

The URS Strategic Analysis of the Vale of White Horse Local Plan to 2031 Part 1 states: ? There is a likelihood that residents in new housing areas at Harwell Oxford Campus would access employment opportunities further afield. This has the potential to increase traffic on the A34 which is already known to be congested and operating over its designed capacity in peak periods.? (SOURCE: URS, SA of the Vale of White Horse Local Plan to 2031, Appendix 14, SA3)

In addition, the increased traffic on the A34 poses further threats to the tranquillity and character of the AONB. SA 9 of the URS Strategic Analysis states, with regards to the proposed sites at the Harwell Oxford Campus ?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.? (SOURCE: URS, SA of the Vale of White Horse Local Plan to 2031, Appendix 11)

Furthermore, the ?Science Transit and bus Study? for dedicated bus routes from Didcot to Harwell have confirmed that Section 4.2, page 15:

?The following additional locations are also expected to experience regular traffic congestion in future years, as residential and employment growth takes place across the Science Vale: v. Hagbourne Hill, northbound approaching the A417 London Road, and southbound approaching the Chilton Interchange (A34/A4185); vi. A4185 Newbury Road, southbound from the Harwell Campus to the Chilton Interchange and the bridge across the A34 at the Chilton Interchange?.

These impacts are significant as the ONLY access Chilton residents have to their village is from the access roads adjoining the A4185 at the Chilton Interchange.

Given that the A34 has been identified as a major barrier to economic growth, and that there is a likelihood that development at the Harwell Oxford Campus would add to traffic issues on the A34, it would appear premature to proceed with large strategic housing allocations within the protected landscape of the North Wessex Downs AONB until (a) there is a proven track record of economic growth in the area (b) issues surrounding capacity on the A34 have been addressed and (c) it has been proven that housing must be located in this area with a full analysis as required by the NPPF paragraphs 115 and 116.

Summary: The allocation of the 1400 houses within the AONB is predicted to aggravate traffic congestion on the A34 trunk road, which is already overloaded at peak times, and is therefore unsustainable.

**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, 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 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. ? 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 ? 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. Only by implementing these steps in full will the Local Plan be compliant with the NPPF paragraphs 115, 116 and the CROW Act 2000. Furthermore, the removal of the housing developments within the North Wessex Downs AONB will likely lead to less people commuting out of the AONB than would be commuting in for work at the Harwell Oxford Campus.

**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?** Yes - I wish to participate at the oral examination

**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.

**Q7 If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:**

I wish to make sure that my representation is fully understood.