



# Vale of White Horse Local Plan Part One: Strategic Sites and Policies Publication Stage Representation Form

Ref:

(For official  
use only)

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\*

*\*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.*

### 2. Agent's Details (if applicable)

Title	Mr	
First Name	Keith	
Last Name	Mintern	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	71 Crafts End	
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Line 3	Didcot	
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Post Code	OX11 0SB	
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation :

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

Paragraph	5.61	Policy	Core Policy 15:Spatial Strategy for the South East Vale Sub-Area	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	X	No	
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	X
4 (3) Complies with the Duty to co-operate	Yes	X	No	

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.

Paragraph 5.61 states that “Two of our strategic housing sites are located within the North Wessex Downs AONB. Paragraph 116 of the NPPF states that planning permission should be refused except in exceptional circumstances and where it can be demonstrated they are in the public interest”.

Paragraph 116 of the NPPF in full is as follows:

“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”

Despite extensive searching through documents, there are no statements from the VWHDC which fully comply with paragraph 116 of the NPPF. Instead, they have justified the largest housing allocation on any greenfield site in any AONB or National Park in the UK with the following statements:

*“In identifying the preferred site package, the Council first considered those sites that were not located within the North Wessex Downs AONB or the Oxford Green Belt. However, given the level of housing required, sites have been identified within the AONB and Oxford Green Belt.”*

*A mix of sites are required that would deliver homes in the short as well as longer term to restore and maintain a five year housing land supply. Therefore in order to achieve this it has been necessary to consider sites in AONB and Green Belt.”*

(SOURCE: URS SA Report Final, Paragraphs 13.1.1 and 13.1.2 )

This statement alludes to the fact that large scale housing allocations within the AONB have been proposed in order to “maintain a 5 year housing supply”, which does not demonstrate exceptional circumstances as required by the NPPF 115 and 116.

Further justification for building within the AONB is as follows:

*“The Harwell Campus is an existing and well established development within the North Wessex Downs AONB (present before the AONB was set up in 1972). 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.”*

NOTE: The European Space Agency has its headquarters in Paris, not Harwell, and has a number of other offices worldwide. The Harwell office employs circa 100 most of whom are already working on the Campus.

*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 to areas where, with planting screening, it would not cause significant visual harm.”* (SOURCE: URS SA Report Final, Paragraphs 13.3.5 and 13.3.6)

The VWHDC clearly believe that the economic benefits that might be derived from the proposed job growth at the Harwell Oxford Campus qualify for the “exceptional circumstances” with which they should be allowed to build in the North Wessex Downs AONB. Surprisingly, the VWHDC do not appear to have consulted with the Harwell Oxford Campus on housing requirements to support the campus prior to the publication of the Local Plan to 2031 in February 2014, a point which was further proven when the Harwell Oxford Campus published their initial strategy for the campus which appears to be at odds with the VWHDC’s vision for housing need in the area.

However, there is no clear statement from the VWHDC on “The need for the development, including

in terms of any national considerations, and the impact of permitting it, or refusing it, on the local economy”, and as such is non-compliant with the NPPF Paragraph 116.

KEY POINTS: With regards to the NPPF paragraph 116

- There is unlikely to be any negative impact on the local economy if the 1,400 houses allocated to the North Wessex Downs AONB does not go ahead
- There are viable and alternative sites allocated outside of the North Wessex Downs AONB, but still within the preferred Science Vale, that have already been identified by the VWHDC that can provide the housing needs without building on the North Wessex Downs AONB
- Little regard has been given to the environmental impact of the proposed developments within the North Wessex Downs AONB, particularly with respect to light, noise, pollution and change of character through urbanisation. The cumulative impacts of the proposed developments, combined with development at the Harwell Oxford Campus and the inevitable coalescence of the new development with the “Smaller Village” of Chilton have not been assessed.

The SQW/Cambridge Econometrics Report clearly does not regard housing delivery as a constraint to economic growth; “based on past rates of employment and housing growth there is no evidence that one constrained the other” (SOURCE: Cambridge Econometrics, Economic Forecasting to Inform the Oxfordshire Strategic Economic Plan and Strategic Housing Market Assessment, Feb 2014, page 40). Therefore, by removing the strategic housing sites within the AONB, economic growth at the Harwell Oxford Campus is unlikely to be constrained.

This assertion is further justified by the number of viable alternative sites close to the Harwell Oxford Campus, outside the AONB, as required by NPPF Paragraph 116 “The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way”.

77% of the Vale of White Horse is NOT within the North Wessex Downs AONB, and the VWHDC states that “It is a fact that we have sufficient land supply to physically meet our housing needs” (SOURCE: Draft Local Plan to 2031, page 17, paragraph 69).

A review of the URS Strategic Assessment Appendices, and the Site Information Tables, confirm that several alternative sites close to the Harwell Oxford Campus, but not inside the AONB, as scoring more favourably in terms of development potential than the sites around the Harwell Oxford Campus.

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”.***

However, the VWHDC has not allocated any housing to Didcot A, despite them both being within the Science Vale and outside the boundary of the North Wessex Downs AONB.

#### **Didcot A:**

Didcot A has the capacity for up to 425 dwellings, with Core Policy 16 of the Local Plan: Didcot A Power Station, page 73, stating that “The provision of other uses on the remainder of the site such as residential, ancillary retail, institutional or community use will be considered favourably”.

The reason stated for not carrying this site forward was given as “Redevelopment of the site to be supported by policy. No specific allocation proposed. Refer to site TPS 058 “, with site TPS 058

stating “The site is safeguarded primarily for employment through Core Policy 13. The policy does however provide some flexibility for redevelopment on the wider site for mixed uses including residential. Therefore it is not appropriate to include as a separate allocation.”

(SOURCE:

<http://www.whitehorsedc.gov.uk/sites/default/files/Topic%20Paper%203%20reduced.pdf>)

The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document

(<http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%20February%202014.pdf>)

states, with regards to Didcot A:

“Sustainability Appraisal: No likely significant negative effects identified. Likely significant effects identified against four objectives.”

And whilst potential transport issues have been identified, there are committed improvements to the road network at that location, including the dualling of the A4185. The report further notes that “Potential opportunities for improved public transport links and the site is well located for access to Didcot Railway Station.”

#### **Site 47: Land West of Steventon**

The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document

(<http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%20February%202014.pdf>)

states, with regards to the Land West of Steventon:

“Sustainability Appraisal: No significant negative effects identified. Significant positive effects against SA Objective 1.”

The whole site has a maximum capacity for 1,175 houses.

Under transport, the following was stated “There are capacity issues on the wider highway network, particularly to the south of Abingdon-on-Thames and north of Didcot. Development at this location may lead to a significant negative effect. The site is located close to Milton Park and Harwell Oxford employment sites and has good access to the A34. The railway line to the south presents a barrier particularly as this is likely to be a significant direction of travel”.

The reasons for not developing this site were given as “Existing significant utility infrastructure would constrain development on this site, and there are also significant highways constraints in the area”.

However, this site assessment was carried out on a housing allocation of 1,175 dwellings. If 350 houses were built on this site, as recommend on landscape grounds, then much of the above mentioned potential negative effects can be completely mitigated as less than 30% of the site would be taken forward for development. Steventon is also well placed to benefit from improved public transport links running between Grove and Milton to Didcot, presumably through Steventon, have been described in The Local Plan under Core Policy 17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area. Further to this, Steventon has a good selection of dining pubs, a Co-operative supermarket, a hairdressers, and a café amongst its services and therefore is an attractive place to live.

#### **Site 12: Increased Density on Valley Park**

Valley Park has already been identified as having an additional capacity for up to 1,200 homes.

The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document

(<http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%20February%202014.pdf>)

states, with regards to Increased Density on Valley Park:

“Sustainability Appraisal: No likely significant negative effects identified. Likely significant positive effects against four objectives”.

With the site being recommended for development because “The site is well-located to the Great Western Park development, and should be planned as part of a wider masterplan alongside sites 10 and 11. Higher densities should be located towards the AONB and to minimise any impact on separation of Didcot and Harwell”.

#### **Site 17: Harwell Oxford Campus**

By contrast, The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document

(<http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%20February%202014.pdf>)

states, with regards to Site 17 Harwell Oxford Campus:

“Sustainability Appraisal: Likely significant positive effects against three objectives. Likely significant negative effects against SA objectives 8 (protect cultural heritage and provide a high quality landscape and townscape) as the site is located within the AONB; and 9 (Reduce noise, light, and air pollution) because the site is adjacent to the A34 and increased traffic, noise, and light could have a significant negative effect on the tranquillity of the AONB.

Therefore, a quick appraisal of the potential alternative available sites indicates that the 1,400 houses at the Harwell Oxford Campus could easily be accommodated through strategic allocations at a combination of aforementioned sites: Didcot A (up to 425 dwellings), Land West of Steventon (up to 350 dwellings) and Increased Density at Valley Park (up to 1,200 dwellings).

These sites provide real and viable alternatives to building up to 1,400 houses within the AONB. All are well placed to serve the Science Vale and all perform better in the Strategic Assessment with less potential negative impacts than the Harwell Oxford Campus site.

**By reallocating the houses within the AONB to these other sites, or distribute the housing across the western vale, for example, the VWHDC could comply with Paragraph 116 of the NPPF “The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way” as it is obvious that the need for housing can easily be met in other ways.**

The last section of the NPPF Paragraph 116 states that an assessment should be included of “any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which they could be moderated”.

Whilst the VWHDC have carried out a Landscape and Visual Impact Assessment (LVIA), the failings of which will be fully described in the response to Paragraph 5.63 of the Local Plan, little or no consideration appears to have been given to the detrimental effect on the environment.

The original appraisal of the site, Appendix 11 of the URS SA of the Vale of White Horse Local Plan 2031 Part 1: Appendices states the following with regards to developing the Harwell Oxford Campus:

“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, 37 and 38 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 the AONB should contribute towards the objectives of the AONB Management Plan”.

“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 and 33 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”.

“SA 11: The site is a greenfield site which contains 140ha of Grade 2 Agricultural Land. Developing this site would result in the loss of Best, Most Versatile Land. Grade 2 land is the best quality in the borough and should be given greatest protection from development; however the NPPF indicates that such land can be released where deemed necessary”.

As such, the Local Plan does not comply with the NPPF paragraphs 115 and 116, or the CROW Act 2000 and is 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.

In order to make the Local Plan sound and legally compliant with the NPPF paragraphs 115 and 116, 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 SHMA allocation by 1000 homes
- 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.**

7. 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

☐

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:

11/12/14