

## Comment

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Comment by	Mrs Teresa Griffiths
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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

**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 requirements of the Act as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the requirements of the Act, 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. Planning permission should be refused 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: full is as follows:

"Planning permission should be refused for major developments in these designated areas except in exceptional circumstances where 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, on 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.

Any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that

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

?In identifying the preferred site package, the Council first considered those sites that were not located within the North Wessex Downs AONB. 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 fine landscape. To achieve this it has been necessary to consider sites in AONB and Green Belt. (SOURCE: URS SA Report Final, Paragraph 13.3.5)

This statement alludes to the fact that large scale housing allocations within the AONB have been proposed in order to support the campus. It 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 (previously designated as a Special Landscape). The campus is of international importance and national economic significance as a world-class centre for science, technology and innovation (including 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 is based in Paris, not Harwell, and has a number of other offices worldwide. The Harwell office employs circa 100 most of whom are employed by the UK government.

The Council believes that the international significance of the site provides uniquely exceptional circumstances to justify building within the AONB. Any development will need to be sensitively planned to minimise impact on the AONB whilst delivering a high quality development. The original proposals have been refined and reduced based on more detailed landscape advice, restricting development to the edges of the campus. It is not considered that the development will 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 outweigh the circumstances? with which they should be allowed to build in the North Wessex Downs AONB. Surprisingly, the VWHDC has not considered the Harwell Oxford Campus on housing requirements to support the campus prior to the publication of the Local Plan to be proven when the Harwell Oxford Campus published their initial strategy for the campus which appears to be at odds with the NPPF. However, there is no clear statement from the VWHDC on ?The need for the development, including in terms of the impact on the local economy?, and as such is non-compliant with the NPPF Paragraph 116.

KEY POINTS: With regards to the NPPF paragraph 116

- 1 There is unlikely to be any negative impact on the local economy if the 1,400 houses allocated to the North Wessex Downs AONB are built.
  - 2 There are viable and alternative sites allocated outside of the North Wessex Downs AONB, but still within the Vale of White Horse, identified by the VWHDC that can provide the housing needs without building on the North Wessex Downs AONB.
  - 3 Little regard has been given to the environmental impact of the proposed developments within the North Wessex Downs AONB, including noise, pollution and change of character through urbanisation. The cumulative impacts of the proposed developments within the Harwell Oxford Campus and the inevitable coalescence of the new development with the ?Smaller Village? of Chilton are not considered.
- The SQW/Cambridge Econometrics Report clearly does not regard housing delivery as a constraint to economic growth. The report states that housing growth there is no evidence that one constrained the other? (SOURCE: Cambridge Econometrics, Economic Plan and Strategic Housing Market Assessment, Feb 2014, page 40). Therefore, by removing the strategic allocation of housing to 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. ?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 the Vale of White Horse can 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 are available 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 concludes that ?In terms of the best-performing site options, these are considered to be sites at Valley Park, Didcot A, and Didcot B. These sites have no significant constraints and would lead to various positive effects, particularly in terms of housing, reducing travel times, and providing 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 of White Horse 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 site. The use of the site for other uses on the remainder of the site such as residential, ancillary retail, institutional or community use will be considered. The site has been put forward this site forward was given as ?Redevelopment of the site to be supported by policy. No specific allocation proposed for the site. ?The site is safeguarded primarily for employment through Core Policy 13. The policy does however provide some flexibility for other uses including residential. Therefore it is not appropriate to include as a separate allocation.? (SOURCE: URS SA Report Final, Paragraph 13.3.5)



?SA 8: The landscape study recommends that the site has low landscape capacity and no part of the site is suitable for AONB and there is also one listed building along the boundary of the site. Core Policies 34, 37 and 38 would apply to AONB and surrounding a listed building would likely lead to significant negative effects in terms of the landscape and important views, natural features, tranquillity and noise and light pollution. As part of design and mitigation measures, they 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) on the road. The site is in a sensitive location within the AONB which could have significant negative effects in terms of the landscape. Policies 29 and 33 would apply to reduce the significance of pollution impacts; however given the sensitivity of the AONB the impact is likely to be significant.

?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 Grade 2 land is the best quality in the borough and should be given greatest protection from development; however it may be 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.

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound in relation to the above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is itself a breach of the duty to co-operate. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you can refer to the 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 suggested:

- 1 Remove the entire allocation of 850 homes from the Harwell East Campus.
- 2 Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of homes to be allocated to the given outline permission)).
- 3 Include provision of up to 400 new homes at the North West Harwell Campus( including the 125 already given permission). This site is contained within the perimeter of the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus.
- 4 Reallocate the 850 homes from the Harwell East Campus and the additional 150 houses from the North West Harwell Campus to 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) Land West of Steventon (capacity for 350 houses), or
  - ? (c) Land at Steventon
  - ? (d) Distributed throughout the West Vale in order to encourage a more even distribution of housing more equally across the district.
- 1 Or reduce the SHMA allocation by 1000 homes
- 2 Remove the North Wessex Downs AONB entirely from the Science Vale ?Ringfence? in order to protect it from the impact of 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 justify the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the examination of the Local Plan.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues raised in the examination.**

**Q6 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 part of the examination?