

## Comment

<b>Agent</b>	Mr Steve Sensecall (724452)
<b>Email Address</b>	ssensecall@kempandkemp.co.uk
<b>Company / Organisation</b>	Kemp and Kemp
<b>Address</b>	Elms Court Botley OX2 9LP
<b>Consultee</b>	Harwell Oxford Campus Partnership (758106)
<b>Company / Organisation</b>	Harwell Oxford Campus Partnership
<b>Address</b>	unknown unknown unknown
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<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	Yes
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	Yes
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	N/A

**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.**

43. In the Sustainability Appraisal (SA) (October 2014) it states at paragraph 13.1.3 that on page 58 that: 'Following the Housing Update Delivery Consultation (February 2014), major concerns were raised by Natural England, and the AONB Management Board with regard to the landscape sensitivities of the AONB at the proposed strategic sites at North West Harwell Campus and East Harwell Campus on the ability to mitigate visual impacts satisfactorily.'

44. It goes on to state at paragraph 13.1.4 in the SA that: 'In recognition of the landscape sensitivities of these sites a Landscape and Visual Impact Assessment (LVIA) has been prepared to inform the scale and form of the development of land surrounding Harwell Campus to accommodate future residential development.'

45. The Council appointed Hankinson Duckett Associates to undertake this work (the original landscape assessment work having been carried out by Kirkham Landscape Planning/Terra Firma). Hankinson Duckett Associates identified seven land parcels. Two of these parcels were considered worthy of further work, and were sub-divided into eight sub-areas. Those areas are identified at figure 13.1 in the SA Report and comprise the entirety of the East of Harwell Campus allocation (divided into six sub-parcels) and the western (green field) element of the North of Harwell allocation.

46. The Hankinson Duckett Associates LVIA came to a different conclusion to that reached in the February 2014 Landscape Capacity Study. The results of the analysis of the East of Harwell allocation still confirmed that it had medium/high landscape sensitivity, medium/high landscape value and that its resulting landscape capacity was 'low'. However, at page 9 in the main report it then states that: 'Potential impacts of housing development within this parcel - Developing the whole [of the East of Harwell Campus] parcel would harm the character and appearance of the AONB. New housing would be out of context with the existing settlement plan and highly visible from the surrounding rural landscape. Developing part of the parcel may have less significant impact.'

47. Hankinson Duckett also analysed the green field element of the North of Harwell allocation. That analysis concluded that its landscape sensitivity was 'medium'; that its landscape value was 'medium/high' and that its resulting landscape capacity was 'medium/low'. This is consistent with the findings of the Landscape Capacity Study of Contingency Sites, which formed part of the evidence base for the Housing Delivery Update and which has been updated as part of the evidence base for the current draft Plan. That study, which was carried out by Kirkham/Terra Firma concluded that the land 'north west of Harwell Campus' i.e. the entirety of the proposed allocation comprising greenfield and brown field land is 'visually contained' and has 'potential for housing' subject to more detailed study.<sup>18</sup>

48. It goes on to state that:

'Potential for landscape mitigation and contribution to green infrastructure' landscape mitigation is more feasible in some parts of the parcel. The immature shelter belt could be strengthened and replicated without significant change or erosion of landscape character. The existing hedgerow along Icknield Way could be strengthened and extended. The planting along the A34 could be strengthened, which would improve the character of the parcel.'

49. It is self-evident that there is an inconsistency between the conclusions in respect of the East of Harwell allocation in the original Vale Landscape Capacity Study (February 2014) and the recommendations from Hankinson Duckett Associates. This is in contrast to the position in respect of the North of Harwell allocation where both sets of consultants have concluded that the site has potential for housing. Even taken at face value, whilst parts of the land to the East 'may have less significant impact', the studies are consistent in recognising the potential for development to the north and north-west of the Campus.

50. Returning to the SA Report, under the heading Further Justification paragraphs 13.3.4 - 13.3.6 read as follows: '13.3.4 Two of the proposed sites (East and North of Harwell Campus) are located within the North Wessex Downs AONB. Paragraph 116 of the NPPF states that planning permission for major developments in the AONB should be refused except in 'exceptional circumstances' and where it can be demonstrated they are in the public interest. 13.3.5 Harwell Campus is an existing and well established development within the North Wessex Downs AONB. 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. 13.3.6 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.?

51. That justification, of course, would be all the more relevant to a proposal for housing on largely brownfield land actually within and integrated directly with the Campus.

52. The findings and recommendations that flow from this assessment are recorded in Part 3 of the SA. The findings in respect of the East of Harwell Campus site are summarised in the table at pages 110-112 in the SA report. In that table the commentary records 'major negatives' in respect of cultural heritage, townscape and landscape and the requirement to reduce air, noise and light pollution. The 'major negative' in respect of the first issue stems from the site's location in the AONB and its 'low landscape capacity'.

53. The findings and recommendations in respect of the North of Harwell Campus site are recorded at pages 112 and 113 in the SA report. That site records only one 'major negative' in respect of the requirement to reduce air, noise and light pollution. It is recorded as having a 'minor negative effect' in terms of cultural heritage.

54. There is still a requirement on Local Planning Authorities (LPAs) when they consider allocating land in the AONB for development, and on landowners and developers when making planning applications, to consider brownfield land ahead of greenfield sites (NPPF, para 111) and to assess the detrimental effect on the landscape and to show how this could be moderated (NPPF, para 116). More particularly, paragraph 116 of the NPPF requires major development within an AONB to meet the so called 'major development test', a key component of which is whether the need for the development could be met with less impact elsewhere.

55. This suggests that the land identified above at the northern end of the Harwell Campus should be considered ahead of the land to the east. In this regard, it is self-evident that further development on brownfield land (and land already committed to development) within the existing campus, where there is capacity for additional housing without compromising the campus's primary focus on employment-generating development, will cause less harm to the AONB than development on adjacent green field land.

**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:**

The Harwell Campus is central to the Council's spatial and economic strategy. It is therefore vitally important that the Harwell Campus Partnership has an opportunity to present its objections to the draft local plan both orally and in writing.