

## Comment

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Comment by	Joel Dothie
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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 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. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or if you wish to co-operate, please also use this box to set out your comments.**

Paragraph 6.111: ?The conservation of the intrinsic character and beauty of the countryside is a core planning principle and the planning system should contribute to and enhance the natural and local environment by protecting and enhancing it.

Rather than striving to protect and enhance valued landscapes, the VWHDC have allocated the largest strategic housing allocation to the North Wessex Downs AONB in the whole UK. The single allocation of 850 houses within the North Wessex Downs AONB is on a small scale. However, the VWHDC have allocated a further 550 houses to the North Harwell Campus bringing the total number of houses within the North Wessex Downs AONB to 1,400.

As such, the VWHDC have been neglecting their legal responsibilities under the NPPF paragraphs 115 and 116, the AONB's statutory Management Plan 2009-2014 that the VWHDC is a partner of.

Key Issues affecting the North Wessex Downs AONB: ? Expansion of the main urban areas just outside the AONB on the boundaries of the AONB. ? New large free-standing houses as replacement dwellings in open countryside and activities and associated signage. ? Unsympathetic incremental expansion of the settlements of and adjacent to the surrounding countryside. ? Potential for major development to intrude onto open downland, including masts, pylons, and mineral extraction and waste management, threatening the senses of remoteness and tranquillity. ? The future sites within the AONB, especially redundant airfields and military sites (as at Wroughton), and the impact upon land developments at junctions of the M4 and A34. ? Lack of knowledge about the boundaries of the current pools of traffic within the AONB and the implications of light spillage from development in and around the AONB. This matter is covered in the AONB's statutory Management Plan 2009-2014 that the Local Authority, the Vale of White Horse District Council, is

The original capacity assessment of the Harwell East Campus, summarised in Appendix 11 of the URS SA report states: ?SA 8: The landscape study recommends that the site has low landscape capacity and no part of the site is suitable for development located within the AONB and there is also one Listed Building along the boundary of the site. Core Policies 34 (Landscapes) and 35 (Historic Environment) would apply; however, such a scale of development within the AONB and surrounding a Listed Building would have significant negative effects in terms of the landscape and historic environment.?

Despite this, the VWHDC still proceeded with an unprecedented housing allocation in the North Wessex Downs AONB.

The VWHDC then appointed Hankinson Duckett Associates to undertake a landscape and visual appraisal of the land around the Harwell Oxford Campus (Plan HDA 1, September 2014). This report assesses the relative capacity of parcels of land surrounding Harwell for future residential development. In light of this document, the Vale of White Horse District Council states:

?AONB/Alternatives: in recognition of the landscape sensitivities of these sites a Landscape and Visual Impact Assessment was prepared to inform the scale and form of the development of land surrounding Harwell Campus to accommodate future development. The Council commissioned a bespoke Landscape and Visual Impact Assessment (LVIA) for all land parcels around the Harwell Campus for the option testing, with a view to identifying the optimum level of growth at the site that could be achieved without leading to unacceptable effects on the AONB. The LVIA involved assessing the likely effectiveness of mitigation measures, proposing a mitigation strategy to reduce the residual landscape and visual impacts once these measures had been applied the SA assessed the more detailed impacts of the Harwell Campus and was informed by the LVIA, and the scale of development proposed in the AONB has been reduced. (SOURCE:

[http://whitehorsedc.moderngov.co.uk/documents/s24349/14\\_10\\_06\\_VoWH%20Local%20Plan%20Part%201%20Consultation%20Document](http://whitehorsedc.moderngov.co.uk/documents/s24349/14_10_06_VoWH%20Local%20Plan%20Part%201%20Consultation%20Document)

However, the VWHDC is misleading the public by stating that the ?proposed development in the AONB has been significantly reduced? as the sites were allocated to the Harwell East Campus in the Local Plan Part 1 in February 2014, and the updated version still states that the North Wessex Downs AONB to the Harwell Oxford Campus albeit split between two sites on opposite sides of the AONB.

Further to this, it is hard to believe that the unprecedented building of 1,400 homes at a single strategic geographical location will have ?significant negative effects? on the AONB as stated above. The scale of development alone will lead to adverse effects on the tranquillity and remoteness of the AONB, and will further be out of character with the other settlements in the area and will significantly adversely change the character of Chilton village.

The LVIA carried out by Hankinson Duckett Associates also fails to assess the cumulative impacts of the proposed development at the Harwell Campus, the North Harwell Campus with the full development of the Harwell Oxford Campus itself in terms of the coalescence of the resulting settlement with Chilton. The VWHDC don't appear to have considered these cumulative impacts or the significant adverse effects on the tranquillity and remoteness of the AONB, and the character of the area either, as required by the legislation:

Directive 85/337/EEC, as amended by Directive 97/11/EC, requires consideration of the direct, indirect, secondary and cumulative impacts of a project. The EIA Directive also requires consideration of the interactions between potential environmental impacts.

Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2004 requires consideration of the likely significant effects of a development which specifically includes the assessment of cumulative effects.

The total cumulative impact of this combined ?settlement? on the AONB has been ignored by the VWHDC and thus the degree of urbanisation that will result from their proposals. The sheer scale of the combined housing and employment will have significant negative effects on the sensitive AONB.

More interestingly, the Internal Appraisal of the Harwell Oxford Campus site after the conclusion of the Hankinson Duckett Associates report concludes the following (SOURCE: URS Strategic Analysis of the Vale of white Horse Local Plan 2031, Appendix 11):

The Harwell Oxford Campus sites were sub-divided into land parcels A, B, C, D, E, F, G and H. Highlights from the Internal Appraisal of the Harwell Oxford Campus sites against each of the SA criteria are quoted below:

? ?SA 2: The four options allocate housing and not services or facilities. However, increased local customer base/s the options would benefit local businesses and potentially encourage new economic activity in Harwell/South East V at Harwell Oxford Campus were pursued this could have the benefit of allowing development to occur elsewhere a distribution of growth (and spending power) could be assumed to support services and facilities in the rural areas ? west of the district ? more than by focussing growth at Harwell Oxford Campus. ? ? ?SA 3: All four locations are rea of public transport and will benefit from transport improvements through the Science Vale Transport Strategy. The s towards their funding and would help improve public transport in the south east district. Furthermore, the site is well-lo opportunities at Harwell Oxford Campus which should help encourage walking and cycling to the site. Other employe nearby too in the Science Vale Enterprise Zone. The four options would all lead to positive effects by linking housing however the scale of development would likely lead to an increase in traffic on local roads. There is a likelihood that t at Harwell Oxford Campus would access employment opportunities further afield. This has the potential to increase already known to be congested and operating over its designed capacity in peak periods.?

?SA 6: It is noted that a high-growth approach at Harwell Oxford Campus would reduce the amount of development A low-growth approach at Harwell Oxford Campus would require development elsewhere across the district to meet it could be argued that a wider distribution of growth (and spending power) could be more beneficial in supporting the those areas in the rural west of the district.?

?SA 8: In terms of individual parcels, the Landscape and Visual Impact (LVIA) study at Harwell Oxford Campus sta mitigation possible? for parcels E and F and that they would lead to significant adverse effects on the landscape an are the parcels that are most capable of being mitigated.?

?SA 9: The scale of development at the site would likely generate additional vehicle movements which could lead to locally. The site is in a sensitive location which could have significant effects in terms of tranquillity of the AONB. Pa may act in combination to affect tranquillity; however the LVIA states that this is capable of being mitigated if retain and F are not capable of being mitigated and as such have the potential to increase light pollution in the AONB. If it scale of development would likely lead to a greater effect in terms of air, noise and light pollution in the AONB, Option due to lowest growth and least impact on tranquillity in AONB.?

?SA 11: The options are all located on greenfield grade 2 agricultural land which is classified as the Best and Most leading to the least loss of Grade 2 land ? Option A ? can be said to be the best performing in terms of this objectiv

Rather than advocate building such large numbers of houses within the North Wessex Downs AONB, the URS inter Oxford Sites suggests that a lower housing growth should be attributed to the Harwell Oxford Campus so that econ encouraged across the Western Vale, and would be more beneficial in supporting the rural areas.

Given the scale of proposed housing within the south east vale and Didcot areas, up to 21,690 dwellings, there is n further 1,400 homes in the North Wessex Downs AONB as required by the NPPF paragraph 116. In addition to the fenced to the South East Vale by the VWHDC, there are 6,300 homes ring fenced to the Didcot area by South Oxford brings the housing provision for supporting the Science Vale to  $11,850 + 6,300 = 18,150$  dwellings. South Oxfordshire up to a further 60% of 5900 houses to the Didcot area in order to support the ?Science Vale?. This would bring the  $18,150 + 3,540 = 21,690$  homes. Furthermore, 275 houses have just been completed at Chilton, an additional 200 ho and there is planning permission for another 125 homes to the north of the Harwell Oxford Campus (these housing the maps of Chilton and the Harwell Oxford Campus in the Local Plan).

In addition, the current Chilton demographic indicates that only approximately 12% of Chilton residents actually work (SOURCE: Petition against 1,400 homes in the North Wessex Downs AONB handed in by Chilton residents during period.), and the URS Strategic Assessment Report, Appendices, Appendix 14, SA3 reports ?There is a likelihood areas at Harwell Oxford Campus would access employment opportunities further afield. This has the potential to inc is already known to be congested and operating over its designed capacity in peak periods?.

A Mid-Sussex examiner recommended May 2014 that a proposed Sussex neighbourhood plan should not proceed [http://www.planningportal.gov.uk/general/news/stories/2014/Jan14/300114/300114\\_3](http://www.planningportal.gov.uk/general/news/stories/2014/Jan14/300114/300114_3) and <http://www.midsussex.gov.uk/>

"At issue was the fact that three site allocations for housing development fell within the High Weald Area of Outstan and were not necessarily ?deliverable?, according to the examiner. They had not been sufficiently justified given the Planning Policy Framework attached to the protection of landscape and scenic beauty."

As a result, the Local Plan is unsound.

Summary: Whereas Paragraph 6.111 states that ?The conservation of the intrinsic character and beauty of the cou principle of the NPPF? and that ?the planning system should contribute to and enhance the natural and local enviro enhancing valued landscapes? the VWHDC have proceeded to allocate the largest strategic housing allocation with in the whole UK. Further, given the scale of housing within the south east corner of the South East Vale (>20,000 dw need to build a further 1,400 homes in the North Wessex Downs AONB as required by the NPPF paragraph 116.

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty of modification at examination). You will need to say why this modification will make the Local Plan legally compliant 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 homes from the Harwell East Campus. ? Remove the additional allocation of 150 homes from the North West Harwell Campus (reducing the number of houses from 550 to 400 (including the 125 already given outline permission)). ? Include provision of up to 150 homes on the West Harwell Campus (including the 125 already given outline permission), provided that all development is contained within the Harwell Oxford Campus and is controlled by the Harwell Oxford Campus. ? Reallocate the 850 homes from the Harwell East Campus and additional 150 houses from the North West Harwell Campus (1,000 houses in total) to other sites already identified in the SHMA, for example: ? (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes), or ? (b) Land for 425 houses), or ? (c) Land West of Steventon (capacity for 350 houses), or (d) Distributed throughout the West of Steventon to support economic growth and prosperity more equally across the district. ? Or reduce the total SHMA allocation for the Science Vale to 1,000 homes. ? Remove the North Wessex Downs AONB entirely from the Science Vale ?Ringfence? in order to protect it from future 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 justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations at 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 raised at 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 examination.