

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dr James Vincent
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Consultation Point	Core Policy 15: Spatial Strategy for South East Vale Sub-Area (View)
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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 2.14 states that 'the high quality and rural nature of the Vale is borne out by the many designations that cover the district, including AONB, and that it is important that development protects and maintains the special characteristics of the built and natural environment'.

The allocation of two sites in the North Wessex Downs AONB of 850 and 550 houses respectively do not help protect and maintain the special qualities of the AONB.

Instead, this allocation is the single largest strategic housing allocation within a mainly greenfield site in any AONB or National Park to date. Indeed, even the allocation of 850 houses alone represents the largest strategic housing allocation on a greenfield site in any AONB or National Park in the UK. (SOURCE: North Wessex Downs AONB Management Board).

Furthermore, such an unprecedented housing allocation within the North Wessex Downs AONB will have significant negative impacts on the landscape and environment as confirmed by URS who state that, with regards to the East Harwell Campus site (SOURCE: URS SA Report, Appendix 11):

- 1 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 (Landscape), 37 (Design), and 38 (Historic Environment) 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 AONB should contribute towards the objectives of the AONB Management Plan; Integrated Landscape Character Assessment and the Oxfordshire Wildlife and Landscape Study.

- 1 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 (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.**

If these large scale housing developments within the AONB are permitted, there will be significant consequences for all AONBs, National Parks and the Norfolk Broads.

The special characteristics of the natural environment are not being protected; there is clear non-compliance with paragraphs 115 and 116 of the NPPF, the CROW Act 2000 Section 85, and Core policy 44: Landscape. Therefore the plan is unsound.

Summary: The allocation of two largely Greenfield sites within the North Wessex Downs AONB for 850 and 550 houses respectively clearly degrades the special qualities of this AONB and sets a dangerous precedent for all other AONBs within the country.

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, the following modifications are necessary:

- 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 houses from 550 to 400 n.b. the 400 includes the 125 already given outline permission).
- 3 Include provision of up to 400(including the 125 already given outline permission) new homes at the North West Harwell Campus, provided that all development 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 (1,000 houses in total) to other sites already identified by the Vale of White Horse, for example:
 - 1 (a) Valley Park (which has already been assessed as having additional capacity for up to a further 1,200 homes)
 - 2 (b) Didcot A (capacity for 425 houses), or
 - 3 (c) Land West of Steventon (capacity for 350 houses), or
 - 4 (d) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district.
- 1 Or reduce the total SHMA allocation for the District by 1000 houses
 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.

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