

Comment

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Comment by	Mr Ian Page
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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 6.111: ?The conservation of the intrinsic character and beauty of the countryside is a core planning principle of the NPPF stating that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.?

Rather than striving to protect and enhance valued landscapes, the VWHDC have allocated the largest strategic housing allocation within any National Park or AONB in the whole UK. The single allocation of 850 houses within the North Wessex Downs AONB in itself is unprecedented in scale. However, the VWHDC have allocated a further 550 houses to the North Harwell Campus bringing the total number of houses allocated to 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 CROW Act 2000 Section 85, and the North Wessex Downs 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 creating urban fringe pressures on the boundaries of the AONB. ? New large free-standing houses as replacement dwellings in open countryside and insensitive farm diversification activities and associated signage. ? Unsympathetic incremental expansion of the settlements of and adjacent to the AONB, detracting from the surrounding countryside. ? Potential for major development to intrude onto open downland, including masts, pylons, major wind turbine developments, and mineral extraction and waste management, threatening the senses of remoteness and tranquillity. ? The future use of redundant ?brown field? sites within the AONB, especially redundant airfields and military sites (as at Wroughton), and the impact upon landscape. ? The pressure for new developments at junctions of the M4 and A34. ? Lack of knowledge about the boundaries of the current pools of tranquillity and dark night skies within the AONB and the implications of light spillage from development in and around the AONB. This matter is covered in the introduction to the AONB's statutory Management Plan 2009-2014 that the Local Authority, the Vale of White Horse District Council, is a partner of. The original capacity assessment of the Harwell East Campus, summarised in Appendix 11 of the URS SA report states that (respondents bold): ?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.? 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 surrounding Harwell Campus, Oxfordshire (Plan HDA 1, September 2014). This report assesses the relative capacity of parcels of land surrounding Harwell Campus to accommodate future residential development. In light of this document, the Vale of White Horse District Council states: ? 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 the Council commissioned a bespoke Landscape and Visual Impact Assessment (LVIA) for all land parcels around the campus in order to inform the option testing, with a view to identifying the optimum level of growth at the site that could be achieved without leading to significant negative effects on the AONB. The LVIA involved assessing the likely effectiveness of mitigation measures, proposing a mitigation strategy and identifying the residual landscape and visual impacts once these measures had been applied the SA assessed the more detailed options for development around Harwell Campus and was informed by the LVIA, and the scale of development proposed in the AONB has been significantly reduced.? (SOURCE:

http://whitehorsedc.moderngov.co.uk/documents/s24349/14_10_06_VoWH%20Local%20Plan%20Part%201%20Consultation%20Statement_Final.pdf) However, the VWHDC is misleading the public by stating that the ?proposed development in the AONB has been significantly reduced?; 1,400 were allocated to the Harwell East Campus in the Local Plan Part 1 in February 2014, and the updated version still allocates 1,400 houses within the North Wessex Downs AONB to the Harwell Oxford Campus albeit split between two sites on opposite sides of the A4185. Further to this, it is hard to believe that the unprecedented building of 1,400 homes at a single strategic geographical site in the AONB will not lead to ?significant negative effects? on the AONB as stated above. The scale of development alone will lead to adverse effects in terms of both noise and light pollution, tranquillity and remoteness of the AONB, and will further be out of character with the other settlements within the AONB 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 developments at the East Harwell Campus, the North Harwell Campus with the full development of the Harwell Oxford Campus itself in terms of environmental impact and the coalescence of the resulting settlement with Chilton. The VWHDC don't appear to have considered these cumulative impacts and the resulting significant adverse effects on the tranquillity and remoteness of the AONB, and the character of the area either, as required by the following 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 2011 also requires a description 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 does not accurately represent the degree of urbanisation that will result from their proposals. The sheer scale of the combined housing and employment sites in itself will lead to 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 14). The Harwell Oxford Campus sites were sub-divided into land parcels A, B, C, D, E, F, G and H. Highlights from the discussion of 'significant effects' 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/spending power resulting from the options would benefit local businesses and potentially encourage new economic activity in Harwell/South East Vale. If a lower growth approach at Harwell Oxford Campus were pursued this could have the benefit of allowing development to occur elsewhere across the district. A wider distribution of growth (and spending power) could be assumed to support services and facilities in the rural areas particularly those areas in the west of the district more than by focussing growth at Harwell Oxford Campus.' 'SA 3: All four locations are reasonably well-served in terms of public transport and will benefit from transport improvements through the Science Vale Transport Strategy. The sites would directly contribute towards their funding and would help improve public transport in the south east district. Furthermore, the site is well-located for access to employment opportunities at Harwell Oxford Campus which should help encourage walking and cycling to the site. Other employment opportunities are reasonably nearby too in the Science Vale Enterprise Zone. The four options would all lead to positive effects by linking housing to employment opportunities; however the scale of development would likely lead to an increase in traffic on local roads. There is a likelihood that residents in new housing areas at Harwell Oxford Campus would access employment opportunities further afield. This has the potential to increase traffic on the A34 which is 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 in the remainder of the district. A low-growth approach at Harwell Oxford Campus would require development elsewhere across the district to meet housing targets. On this basis it could be argued that a wider distribution of growth (and spending power) could be more beneficial in supporting the rural areas more particularly 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 states that there is 'no effective mitigation possible' for parcels E and F and that they would lead to significant adverse effects on the landscape and AONB. Parcels A, B and G 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 potential noise and air impacts locally. The site is in a sensitive location which could have significant effects in terms of tranquillity of the AONB. Parcel B is near the A34 which may act in combination to affect tranquillity; however the LVIA states that this is capable of being mitigated if retained as open space. Parcels E and F are not capable of being mitigated and as such have the potential to increase light pollution in the AONB. If it can be assumed that a greater scale of development would likely lead to a greater effect in terms of air, noise and light pollution in the AONB, Option A would be the best performing 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 Versatile Land. The Option leading to the least loss of Grade 2 land 'Option A' can be said to be the best performing in terms of this objective.'

Rather than advocate building such large numbers of houses within the North Wessex Downs AONB, the URS internal assessment of the Harwell Oxford Sites suggests that a lower housing growth should be attributed to the Harwell Oxford Campus so that economic growth can also be encouraged across the Western Vale, and would be more beneficial in supporting the rural areas. Given the scale of housing within the south east corner of the south east vale, up to 22,250 dwellings, there is no exceptional need to build a further 1,400 homes in the North Wessex Downs AONB as required by the NPPF paragraph 116. (In addition to the 10,320 houses currently allocated to the South East Vale by the VWHDC, 3,300 houses are currently being built within the Vale at Great Western Park, Didcot.

South Oxfordshire District Council has further allocated 2,330 houses to the Didcot area on the basis of speculative job creation within the Science Vale. This brings the housing provision for supporting the Science Vale to 10,320 + 3,300 + 2,330 = 15,950 dwellings. South Oxfordshire District Council are allocating up to a further 6,300 houses to the Didcot area in order to support the 'Science Vale'. This would bring the total number of dwellings up to 15,950 + 3,540 = 19,490 homes. Furthermore, 275 houses have just been completed at Chilton, an additional 200 houses are being built at Harwell, and there is planning permission for another 125 homes to the north of the Harwell Oxford Campus (these housing allocations are not shown in the maps of Chilton and the Harwell Oxford Campus in the Local Plan). Taking these into account, the total dwellings allocated to supporting the science vale is actually 19,490 + 275 + 200 + 125 = 20,090 houses.) In addition, the current Chilton demographic indicates that only approximately 12% of Chilton residents actually work on the Harwell Oxford Campus (SOURCE: Petition against 1,400 homes in the North Wessex Downs AONB handed in by Chilton residents during the Feb 2014 consultation period.), and the URS Strategic Assessment Report, Appendices, Appendix 14, SA3 reports 'There is a likelihood that residents in new housing areas at Harwell Oxford Campus would access employment opportunities further afield. This has the potential to increase traffic on the A34 which 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 to a referendum: http://www.planningportal.gov.uk/general/news/stories/2014/Jan14/300114/300114_3 and <http://www.midsussex.gov.uk/8952.htm> "At issue was the fact that three site allocations for housing development fell within the High Weald Area of Outstanding Natural Beauty (AONB) and were not necessarily 'deliverable', according to the examiner. They had not been sufficiently justified given the great weight the National Planning Policy Framework attached to the protection of landscape and scenic beauty." As a result, the Local Plan is unsound.

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 and legally compliant, 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) Rowstock (capacity for 515 houses), or ? (d) Land West of Steventon (capacity for 350 houses), or (e) Distributed throughout the West Vale in order to encourage and support economic growth and prosperity more equally across the district. ? Or reduce the total SHMA allocation for the District by 1000 ? 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