

Comment

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Event Name	Vale of White Horse Local Plan 20
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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 NPPF. 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 NPPF, 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. The full text is as follows: "Planning permission should be refused for major developments in these designated areas except where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of: The impact of any national considerations, and the impact of permitting it, or refusing it, upon the local economy The cost of, and the impact of, the designated area, or meeting the need for it in some other way, and Any detrimental effect on the environment, the local community, or the extent to which that could be moderated? Despite extensive searching through documents, there are no statements from the NPPF at paragraph 116 of the NPPF. Instead, they have justified the largest housing allocation on any greenfield site in any AONB or National Park. In identifying the preferred site package, the Council first considered those sites that were not located within the NPPF."

of 515 houses at the site would enable Rowstock to have its own school and therefore become a self-contained village. Over capacity and struggling to cope with the demands of its recent 80% expansion, the proposed 1,400 houses at Rowstock require schooling provision and require a new primary school to be built. Given that Rowstock is better positioned than Harwell at East Hendred, Harwell, Milton Heights and Steventon in the short term, then there is no justification as to why the Harwell Oxford Campus in terms of access to schools in the short term.

Site 47: Land West of Steventon

The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document (<http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%202019%20-%202020.pdf>) states, with regards to the Land West of Steventon: 'Sustainability Appraisal: No significant negative effects identified against SA objectives 1-7. The whole site has a maximum capacity for 1,175 houses. Under transport, the following was stated 'There are no significant constraints to the south of Abingdon-on-Thames and north of Didcot. Development at this location may lead to a significant direction of travel to Milton Park and Harwell Oxford employment sites and has good access to the A34. The railway line to the south of the site is a significant direction of travel'. The reasons for not developing this site were given as 'Existing significant utility infrastructure on the site, and there are also significant highways constraints in the area'. However, this site assessment was carried out on the basis that if 1,400 houses were built on this site, as recommended on landscape grounds, then much of the above mentioned potential negative effects would be taken forward for development. Steventon is also well placed to benefit from improved transport links. The Milton to Didcot, presumably through Steventon, have been described in The Local Plan under Core Policy 17: Delivering a Sustainable South-East Vale Sub-Area. Further to this, Steventon has a good selection of dining pubs, a Co-operative supermarket and therefore is an attractive place to live.

Site 12: Increased Density on Valley Park Valley Park has already been identified as having an additional capacity for 1,200 dwellings. The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document (<http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%202019%20-%202020.pdf>) states, with regards to Increased Density on Valley Park: 'Sustainability Appraisal: No likely significant negative effects identified against four objectives'. With the site being recommended for development because 'The site is well-located to the south of the A34 and is planned as part of a wider masterplan alongside sites 10 and 11. Higher densities should be located towards the A34, Didcot and Harwell'.

Site 17: Harwell Oxford Campus By contrast, The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 Site Information Tables document (<http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20Tables%20-%202019%20-%202020.pdf>) states, with regards to Site 17 Harwell Oxford Campus: 'Sustainability Appraisal: Likely significant positive effects identified against SA objectives 8 (protect cultural heritage and provide a high quality landscape and townscape) as the site is well-located to the south of the A34, noise, light, and air pollution) because the site is adjacent to the A34 and increased traffic, noise, and light could have a detrimental effect on the AONB.

Therefore, a quick appraisal of the potential alternative available sites indicates that the 1,400 houses at the Harwell Oxford Campus can be accommodated through strategic allocations at a combination of aforementioned sites: Didcot A (up to 425 dwellings), Rowstock (up to 350 dwellings) and Increased Density at Valley Park (up to 1,200 dwellings). The total capacity across these sites is viable alternatives to building up to 1,400 houses within the AONB. All are well placed to serve the Science Vale area with less potential negative impacts than the Harwell Oxford Campus site. By reallocating the houses within the AONB to these sites, it is obvious that the need for housing can easily be met in other ways. The last section of the NPPF Paragraph 116 states 'Where there is any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that effect is carried out and Landscape and Visual Impact Assessment (LVIA), the failings of which will be fully described in the assessment, or no consideration appears to have been given to the detrimental effect on the environment. The original appraisal of White Horse Local Plan 2031 Part 1: Appendices states the following with regards to developing the Harwell Oxford Campus: 'The site has low landscape capacity and no part of the site is suitable for development. The site is located within the AONB along the boundary of the site. Core Policies 34, 37 and 38 would apply; however, such a scale of development within the AONB would likely lead to significant negative effects in terms of the landscape and historic environment particularly in relation to noise and light pollution. As part of design and mitigation measures, development at this site within the AONB should be subject to an AONB Management Plan'. 'SA 9: The site is adjacent to the A34 which could lead to increased traffic (and associated noise and light pollution) effects for residents nearest the road. The site is in a sensitive location within the AONB which could have significant negative effects on the AONB. Relevant Core Policies 29 and 33 would apply to reduce the significance of pollution impacts; however given the scale of development, a significant adverse effect'. 'SA 11: The site is a greenfield site which contains 140ha of Grade 2 Agricultural Land. Grade 2 land is the best quality in the borough and should be given greatest protection from development. It is not clear that such land can be released where deemed necessary'. As such, the Local Plan does not comply with the NPPF and is unsound.

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is it will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you 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 allocation of 850 homes from the Harwell East Campus. ? Remove the additional allocation of 150 homes from the N of houses from 550 to 400 (including the 125 already given outline permission)). ? Include provision of up to 400 ne including the 125 already given outline permission), provided that all development is contained within the perimeter by the Harwell Oxford Campus. ? Reallocate the 850 homes from the Harwell East Campus and the additional 150 h houses in total) to other sites already identified by the Vale of White Horse, for example: ? (a) Valley Park (which ha capacity for up to a further 1,200 homes) ? (b) Didcot A (capacity for 425 houses), or ? (c) Rowstock (capacity for 5 (capacity for 350 houses), or ? (e) Distributed throughout the West Vale in order to encourage and support econom district. ? Or reduce the SHMA allocation by 1000 homes ? Remove the North Wessex Downs AONB entirely from 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 neces suggested modification, as there will not normally be a subsequent opportunity to make further representations based on

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issu

Q6 If your representation is seeking a modification, do you consider it necessary No - I do not wish to participate at to participate at the oral part of the examination?