

## Comment

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<b>Comment by</b>	Mr Brian Payne
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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 5.63 states that a landscape and visual impact assessment of the Harwell Oxford site has been carried out and 'The study concludes that the areas proposed for development would not cause significant harm to the AONB and can be successfully mitigated'.

KEY POINTS: 'The conclusion of the Hankinson Duckett Associates report that 'The character of the AONB would change but these changes would be compatible with the management plan and would not constitute significant harm to the wider AONB landscape' is both misleading and inaccurate. 'The AONB Management Plan clearly states that the most pressing Key Issues affecting the North Wessex Downs AONB include: 'The proposed developments, in particular the East Harwell Campus, are on an important open landscape between the Harwell Campus, Harwell village and urban Didcot. The scale of development at Didcot extends right up to the northern perimeter of the North Wessex Downs AONB and as a result it is important to maintain the rural gap between the Didcot developments and the Harwell Oxford Campus. 'The LVIA assessment carried out by the Hankinson Duckett Associates Report on the North Harwell Oxford Campus is significantly smaller than the land allocated for development in the Local Plan 2031 and does not extend all the way to the A4185 as proposed in the development map for the area.

This statement is misleading. (SOURCE: HARWELL CAMPUS Landscape Study by Hankinson Duckett Associates for Vale of White Horse District Council <http://www.whitehorsedc.gov.uk/sites/default/files/2014-07-25%20Main%20Report.pdf>). The document states:

'This is a high level Landscape Study and consequently does not analyse all possible visual receptors or viewpoints. A more detailed assessment should be carried out as part of any future housing development'

The sites proposed for development have a very distinct character forming a transition between the high downs and the clay lowlands of the Vale of White Horse. The Northern site forms an important open landscape between the Harwell Campus, Harwell village and urban Didcot.

The sites fall entirely within the AONB, a high value landscape of high sensitivity. It does not comply with the stated aims of the AONB, AONB guidance and policy, or Vale of White Horse Core Policy 34 relating to the protection of the AONB.

The Icknield Way regional cycle path passes through the sites. The historic and nationally important Ridgeway National Path is located a short distance to the south.

Both of these strategic rights of way are of high value and are located within open landscapes of high value. The characteristics of The Icknield Way will change from open landscape to urban through the development of the site. The Ridgeway will be directly affected, by the visual impact of the housing and there will be a significant urbanisation of the landscape context in which the route is located.

The site is a characteristic of the Hendred Plain Landscape Character Area and is entirely within the North Wessex Downs AONB. The proposed development of East Harwell will be out of scale with the small scale developments in the surrounding villages.

The Icknield Way is a popular cycle route that runs east to west through East Harwell within a highly characteristic open and expansive landscape. Development of the site will result in the loss of the open character and the route running through an urban area.

'National Planning Policy Framework' (NPPF) (DCLG) (2012), which states at paragraph 115: 'Great weight should be given to conserving landscape and scenic beauty National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.'

The highest level of protection is fundamental, and the sacrificing of an important and distinctive protected landscape for development is not acceptable when it is clear that there are large areas, ~77%, of the District outside the sensitive locations of the AONB. Several potentially viable alternative sites, with no current housing allocations, have been identified by the VWHDC which scored more favourably against the strategic objectives than the two sites within the AONB in the SA Scoring Summary Tables (SOURCE: URS SA of the Vale of White Horse Local Plan 2031). The justification given for this site is very tenuous and contains little detail. Bearing in mind paragraph 115 of NPPF, and the Significant Negative impacts, any justification for overturning national guidance, and the wholesale degradation of a nationally designated landscape, has got to be extremely strong and a truly exceptional circumstance. There is no evidence to suggest that this is the case.

ANOMOLIES IN SUPPORTING INFO: (source: <http://www.whitehorsedc.gov.uk/sites/default/files/Part2%202014-07-25%20Supporting%20PlansReduced.pdf>)

? HDA 4: Land parcel 2 for site 19 is different to the land allocated by the VWHDC for development. The Chilton Field Development is shown, but the true extent of the development has not been shown accurately, with the indication of development here being smaller than the actual development. The Chilton Field Development, completed in 2014 resulting in the 80% expansion of Chilton, has been omitted, thereby giving a false impression of the true provision of homes around the Harwell Oxford Campus and the degree of urban sprawl within and adjacent to the AONB. The Land for the North Harwell Campus development, as specified in the above document, is far smaller than the final site proposed for development on page 36 of the Local Plan Part 1 Strategic Sites and Policies Appendices. Therefore, it cannot be an accurate reflection of the potential visual impact of the site. ? HDA 5: Land parcels G and H for site 19 are different to the land allocated by the VWHDC for development.

The conclusions of the Hankinson Duckett report state that ?The character of the AONB would change but these changes would be compatible with the management plan and would not constitute significant harm to the wider AONB landscape.?

Whilst the visual impacts may have the potential to be mitigated to an unsatisfactory extent, the proposals are not compatible with the AONB Management Plan. Instead, the proposal to build on two sites in the North Wessex Downs AONB exacerbate and compound the key issues affecting the AONB as set out in the AONB Management Plan: ? The threat of expansion of the main urban areas just beyond the boundary of the North Wessex Downs, including the main centres of ? Wantage, Didcot ? for example creating urban fringe pressures and impact on the setting of the AONB. ? New housing developments on greenfield sites ? Development that results in a material loss of tranquillity and or impact on the dark night skies within the North Wessex Downs or its setting ? Unsympathetic incremental expansion of the settlements of and adjacent to the AONB, detracting from the surrounding countryside ? The pressure for new developments at junctions of the M4 and A34 ? New road building, new road signage and new street lighting ? 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

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.

EC 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.

The scale of proposed development around the Harwell Oxford Campus is also entirely out of character with the ?typically modest villages? within the North Wessex Downs AONB. Instead, the proposed development is unprecedented in scale in any National Park or AONB within the UK; the outcome of this decision will have untold implications for all National Parks and AONBs. Not only is the scale of proposed development unprecedented, it ensures the coalescence of Chilton into the new proposed East Harwell Development (425 houses of which are likely to be built in Chilton Parish), engulfing North Drive, extending into the proposed North West Harwell Campus development and the Harwell Campus itself.

The plan even suggests the creation of a new self sustainable community!

The resulting ?settlement? would potentially have one of the largest populations of any settlement within the entire North Wessex Downs AONB.  $365 + 275 + 75 + 1400 + 125 = 2,240$  dwellings (Chilton (old) + Chilton Field + North Drive + NEW HOUSING + planning already at North Drive). Taking an average population per dwelling of 2.3, the  $2,240 * 2.3 = 5,152$  population would place the Harwell Campus with the third largest population in the NWD AONB after Marlborough (population of 8009 at 2001 census), and Hungerford (population of 5559 at the 2001 census).

In terms of total area, the combined Harwell Campus and planned residential housing would most likely be the largest urbanised area within the entire North Wessex Downs AONB.

Policy NE6 relates to development within the AONB and states that: ?Development in the North Wessex Downs area of outstanding natural beauty will only be permitted if the natural beauty of the landscape will be conserved or enhanced. Development which would be visually prominent, would detract from views from public vantage points or would spoil the appreciation of the landscape quality of the North Wessex Downs area of outstanding natural beauty will not be permitted. Major industrial or commercial development will not be permitted in the area of outstanding natural beauty unless: i) it is proven to be in the national interest and no alternative site can be found; and ii) all steps are taken to reduce the impact of the development on the beauty of the area.??

The URS Strategic Analysis of the Vale of White Horse Local Plan 2031 Appendices Appendix 14 'Harwell Oxford Campus Site Options', states the following with regards to the land parcels used in the Hankinson Duckett Associates Report: 'SA 2: '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: '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 the 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.' '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: 'Parcels A, B and G are the parcels most capable of being mitigated.' However, the VWHDC have chosen to develop parcels A, B, G and H with areas C and D allocated for a school and leisure, so they have not chosen the least harmful development options. '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. This site is in a sensitive location which could have a significant effects in terms of tranquillity of 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 then Option A (land parcels A, B, and G) would be the best performing due to lowest growth and least impact on the AONB.' However, the VWHDC have chosen to run with option of developing A, B, G and H with a school on land C and D, not the option that impacts the AONB the least.

It is also incumbent on the Local Authority to take account of Section 85 of the Countryside and Rights of Way (CROW) Act 2000 which states: In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty? A relevant authority for the purposes of this section includes? ..3(a) Any public body includes a county council, borough council, district council? .

As a result, the impacts associated with the environmental impact of the two proposed sites within the North Wessex Downs AONB have not been properly assessed and the increased light, noise and pollution cannot be fully mitigated.

The cumulative environmental impact of the East Harwell Campus and the North Harwell Campus have not been considered alongside the impact of developing the Harwell Oxford Campus itself, nor has the cumulative impact of the inevitable coalescence with the 'Smaller Village' of Chilton and the significant change in the character of the local area been considered.

As a result, the 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 SHMA allocation by 1000 homes ? 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