



**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

**If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if applicable)

Title	Mr	
First Name	Keith	
Last Name	Mintern	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	71 Crafts End	
Line 2	Chilton	
Line 3	Didcot	
Line 4	Oxon	
Post Code	OX11 0SB	
Telephone Number		
E-mail Address (where relevant)		

Part B – Please use a separate sheet for each representation

Name or Organisation :

3. To which part of the Local Plan does this representation relate?

Paragraph	1.25 NPPF states “plan should be most appropriate strategy when considered against the alternatives”	Policy	Core Policy 4: Meeting our housing need	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please mark as appropriate.

5. 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.

The VWHDC have chosen to allocate two housing developments within the North Wessex Downs AONB, despite there being viable alternative sites out with the AONB, thus failing to comply with the

NPPF paragraph 116 which states that:

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.”

There are several alternative sites that accommodate the required numbers of houses within the Science Vale without having to build in the AONB. They are:

1. Didcot A: Total Site Capacity up to 425 houses at 25 dwellings/hectare
2. Valley Park: Total Site Capacity for up to an additional 1,200 houses
3. Site 47, Land West of Steventon: Total Site Capacity up to 1,175 houses at 25 dwellings/hectare

Analysis of these sites indicates that, on landscape grounds, Didcot A can accommodate 425 dwellings, Valley Park an additional 1,200 dwellings, and the Land West of Steventon up to 350 dwellings. Therefore, there is plenty of scope to reallocate the 1,400 houses from the AONB to alternative, viable sites. (SOURCE: Local Plan 2013 Part 1 Strategic Sites and Policies, Appendix 5 Site Information Tables.)

Appendix 9 of the URS Strategic Assessment of the Vale of White Horse Local Plan 2031 Part 1: Appendices concluded, with respect to 10 sites considered with long term potential, that “***In terms of the best-performing site options, these are considered to be sites at Valley Park, Didcot A, North West Grove, and Rowstock. They have no significant constraints and would lead to various positive effects, particularly in terms of housing, reducing the need to travel and the local economy, through good access to employment sites and town centres***”.

Currently Didcot A, and the Land West of Steventon have no housing allocation.

Therefore, the decision to allocate 1,400 houses the majority on greenfield land in the North Wessex Downs AONB, the largest greenfield allocation in any National Park or AONB in the UK, is not the most appropriate when considered against the alternatives, and is therefore unsound.

The Harwell-Oxford Campus is a long established development dating back to 1946 and was a feature of the AONB when the later was set up in 1972. It is unsound to use its presence as justification for further development outside its boundaries.

(continue on a separate sheet/expand box if necessary)

6. 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 at 5 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 on greenfield land from the North West Harwell Campus (eg reduce the number of houses from 550 to 400).
- Include provision of up to 400 new homes (including the 125 already given outline approval) 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.
- 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) Land West of Steventon (capacity for 350 houses), or
 - (d) 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 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.

These steps will make the Local Plan compliant with the NPPF paragraphs 115 and 116, and make the Local Plan compliant with the CRoW Act 2000.

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.

7. 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

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

[Empty rectangular box for notes or comments]

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

[Redacted signature box]

Date:

11/12/14