

## Comment

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Comment by	Joel Dothie
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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 as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with 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. In such circumstances, permission should be refused except in exceptional circumstances and where it can be demonstrated they are in the public interest."

Paragraph 116 of the NPPF in full is as follows: "Planning permission should be refused for major developments in the countryside in circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should take account of the need to protect the countryside, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the countryside, including the need to protect the countryside from development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the countryside, including the need to protect the countryside from development elsewhere outside the designated area, or meeting the need for it in some other way, and Any detrimental impacts on recreational opportunities and the extent to which that could be moderated?"

Despite extensive searching through documents, there are no statements from the VWHDC which fully comply with the requirements of the NPPF which justified the largest housing allocation on any greenfield site in any AONB or National Park in the UK with the following

In identifying the preferred site package, the Council first considered those sites that were not located within the North Wessex Downs AONB. However, given the level of housing required, sites have been identified within the AONB and Oxford Green Belt.

A mix of sites are required that would deliver homes in the short as well as longer term to restore and maintain a five per cent housing need. To achieve this it has been necessary to consider sites in AONB and Green Belt. (SOURCE: URS SA Report Final, February 2014, page 40)

This statement alludes to the fact that large scale housing allocations within the AONB have been proposed in order to meet the five per cent housing need. The statement does not demonstrate exceptional circumstances as required by the NPPF 115 and 116.

Further justification for building within the AONB is as follows:

The Harwell Campus is an existing and well established development within the North Wessex Downs AONB (previously designated as a Special Landscape Area). The Campus is of international importance and national economic significance as a world-class centre for science, technology and innovation (including the European Space Agency). It is estimated that at least 5,400 net additional jobs will be created at the campus.

NOTE: The European Space Agency has its headquarters in Paris, not Harwell, and has a number of other offices in the UK, most of whom are already working on the Campus.

The Council believes that the international significance of the site provides uniquely exceptional circumstances to justify development in the AONB. Any development will need to be sensitively planned to minimise impact on the AONB whilst delivering a high quality development. The original proposals have been refined and reduced based on more detailed landscape advice, restricting development to the existing built-up area. This will not cause significant visual harm. (SOURCE: URS SA Report Final, Paragraphs 13.3.5 and 13.3.6)

The VWHDC clearly believe that the economic benefits that might be derived from the proposed job growth at the Harwell Campus outweigh the exceptional circumstances with which they should be allowed to build in the North Wessex Downs AONB. Surprisingly, the VWHDC has not provided any evidence to support the Harwell Oxford Campus on housing requirements to support the campus prior to the publication of the Local Plan to 2031. It is proven when the Harwell Oxford Campus published their initial strategy for the campus which appears to be at odds with the AONB area.

However, there is no clear statement from the VWHDC on the need for the development, including in terms of any net benefit to the local economy, or refusing it, on the local economy, and as such is non-compliant with the NPPF Paragraph 116.

KEY POINTS: With regards to the NPPF paragraph 116 there is unlikely to be any negative impact on the local economy. The North Wessex Downs AONB does not go ahead. There are viable and alternative sites allocated outside of the North Wessex Downs AONB, Science Vale, that have already been identified by the VWHDC that can provide the housing needs without building in the AONB. The VWHDC has been given to the environmental impact of the proposed developments within the North Wessex Downs AONB, and change of character through urbanisation. The cumulative impacts of the proposed developments, combined with the inevitable coalescence of the new development with the 'Smaller Village' of Chilton have not been assessed.

The SQW/Cambridge Econometrics Report clearly does not regard housing delivery as a constraint to economic growth. The report states that housing growth there is no evidence that one constrained the other. (SOURCE: Cambridge Econometrics, Economic Plan and Strategic Housing Market Assessment, Feb 2014, page 40). Therefore, by removing the strategic housing need from the Harwell Oxford Campus is unlikely to be constrained.

This assertion is further justified by the number of viable alternative sites close to the Harwell Oxford Campus, outside the AONB. The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way, is not considered.

77% of the Vale of White Horse is NOT within the North Wessex Downs AONB, and the VWHDC states that it is a fact that the Vale of White Horse can meet our housing needs. (SOURCE: Draft Local Plan to 2031, page 17, paragraph 69).

A review of the URS Strategic Assessment Appendices, and the Site Information Tables, confirm that several alternative sites are available but not inside the AONB, as scoring more favourably in terms of development potential than the sites around the Harwell Oxford Campus.

Appendix 9 of the URS Strategic Assessment of the Vale of White Horse Local Plan 2031 Part 1: Appendices concludes that in terms of the best-performing site options, these are considered to be sites at Valley Park, Didcot A, and Didcot B. These sites have no significant constraints and would lead to various positive effects, particularly in terms of housing, reducing travel times, and good access to employment sites and town centres.

However, the VWHDC has not allocated any housing to Didcot A, despite them both being within the Science Vale and North Wessex Downs AONB.

Didcot A:

Didcot A has the capacity for up to 425 dwellings, with Core Policy 16 of the Local Plan: Didcot A Power Station, part of the site. The remainder of the site such as residential, ancillary retail, institutional or community use will be considered favourably.

The reason stated for not carrying this site forward was given as 'Redevelopment of the site to be

supported by policy. No specific allocation proposed. Refer to site TPS 058 ?, with site TPS 058 stating ?The site is Core Policy 13. The policy does however provide some flexibility for redevelopment on the wider site for mixed uses to include as a separate allocation.? (SOURCE: <http://www.whitehorsedc.gov.uk/sites/default/files/Topic%20Paper%20058.pdf>)

The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 (http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20-%20Didcot%20A.pdf) states, with regards to Didcot A:

?Sustainability Appraisal: No likely significant negative effects identified. Likely significant effects identified against the following objectives:

And whilst potential transport issues have been identified, there are committed improvements to the road network and the site is well located. The report further notes that ?Potential opportunities for improved public transport links and the site is well located for access to the A34.

#### Site 47: Land West of Steventon

The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 (http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20-%20Land%20West%20of%20Steventon.pdf) states, with regards to the Land West of Steventon:

?Sustainability Appraisal: No significant negative effects identified. Significant positive effects against SA Objective 10: A good selection of dining pubs, a Co-operative supermarket, a hairdressers, and a caf  amongst its services and facilities.

The whole site has a maximum capacity for 1,175 houses.

Under transport, the following was stated ?There are capacity issues on the wider highway network, particularly to the south of the site. Development at this location may lead to a significant negative effect. The site is located close to Milton Park and has good access to the A34. The railway line to the south presents a barrier particularly as this is likely to be a significant constraint.

The reasons for not developing this site were given as ?Existing significant utility infrastructure would constrain development. The site is located in an area of highways constraints in the area?.

However, this site assessment was carried out on a housing allocation of 1,175 dwellings. If 350 houses were built on the site then much of the above mentioned potential negative effects can be completely mitigated as less than 30% of the site would be developed. Steventon is also well placed to benefit from improved public transport links running between Grove and Milton to Didcot described in The Local Plan under Core Policy 17: Delivery of Strategic Highway Improvements within the South-Eastern Chilterns. The site also has a good selection of dining pubs, a Co-operative supermarket, a hairdressers, and a caf  amongst its services and facilities.

#### Site 12: Increased Density on Valley Park

Valley Park has already been identified as having an additional capacity for up to 1,200 homes.

The Local Plan Part 2031 Part 1 Strategic Sites and Policies Housing Delivery Update Supporting Paper Appendix 5 (http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20-%20Valley%20Park.pdf) states, with regards to Increased Density on Valley Park:

?Sustainability Appraisal: No likely significant negative effects identified. Likely significant positive effects against the following objectives:

With the site being recommended for development because ?The site is well-located to the Great Western Park development masterplan alongside sites 10 and 11. Higher densities should be located towards the AONB and to minimise any impact on the AONB.

#### 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 (http://www.whitehorsedc.gov.uk/sites/default/files/Supporting%20Paper%20-%20Appendix%205%20-%20Site%20Information%20-%20Harwell%20Oxford%20Campus.pdf) states, with regards to Site 17 Harwell Oxford Campus:

?Sustainability Appraisal: Likely significant positive effects against three objectives. Likely significant negative effects against objectives 8 (Improve the quality of the landscape and townscape) as the site is located within the AONB; and 9 (Reduce noise, vibration and light) as the site is located close to the A34 and increased traffic, noise, and light could have a significant negative effect on the tranquillity of 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 replaced through strategic allocations at a combination of aforementioned sites: Didcot A (up to 425 dwellings), Land West of Steventon (up to 1,175 dwellings) and Increased Density at Valley Park (up to 1,200 dwellings).

These sites provide real and viable alternatives to building up to 1,400 houses within the AONB. All are well placed to be included in the Strategic Assessment with less potential negative impacts than the Harwell Oxford Campus site.

By reallocating the houses within the AONB to these other sites, or distribute the housing across the western vale, for a total of 116 of the NPPF ?The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for housing can easily be met in other ways.

