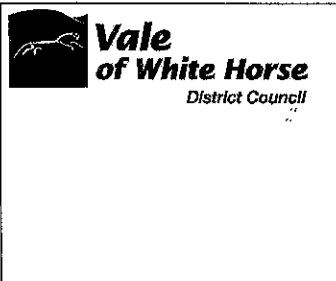


18 DEC 2014

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Already entered as
part of Chilton AONB
Action Group (ID: 829993)

**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

CHRISTOPHER

Last Name

BORAM

Job Title

(where relevant)

Organisation

(where relevant)

Address Line 1

32 CRAFTS END

Line 2

CHILTON

Line 3

DIDCOT

Line 4

OXON

Post Code

OX11 0SA

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	4.24	Policy	Core Policy 4: Meeting out housing needs	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

4 (3) Complies with the Duty to co-operate

Yes

X

No

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.

Paragraph 4.24 states that "It is anticipated that this will deliver approximately 23,000 jobs between 2011 and 2031".

The VWHDC appears to have accepted these job figures without any scrutiny.

A recent planning application for 200 homes in Leicestershire in which the planning Inspector Jonathan G King said he could "place little or no reliance" on the local SHMA (produced by GL Hearn) and was unable to give it "Significant weight in the determination of the application". (SOURCE: <http://majorapps.planningportal.gov.uk/wp-content/uploads/documents/2425527/S62A-2014-0001%20-%20Statement%20of%20Reasons.pdf>). The Inspector also noted that SHMAs should not take into account the "aspirational employment growth of the Local Enterprise Partnership (LEP)" (Paragraph 26).

Further to this, the Oxfordshire Innovation Engine, Realising the Growth Potential, October 2013 (http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf), paragraph 6.10 states that "...road congestion is a major issue for firms: 23% of those responding to our survey identified it as a constraint on growth, and most of those interviewed expressed concerns, particularly in relation to the A34..."

It would therefore seem irresponsible and premature to allocate unprecedented large strategic housing sites on greenfield sites within the legally protected landscape of the North Wessex Downs AONB, particularly if the predicted growth is not realised.

As such, the plan is unsound.

(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, and protect the North Wessex Downs AONB, the following modifications are necessary:

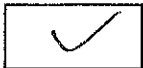
- Remove the entire allocation of 850 homes from the Harwell East Campus.
- Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of houses from 550 to 400 including the 125 already given outline permission)).
- Include provision of up to 400 new homes 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.

Only by implementing these steps in full will the Local Plan be compliant with the NPPF paragraphs 115, 116 and the CROW Act 2000.

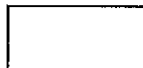
Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original 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

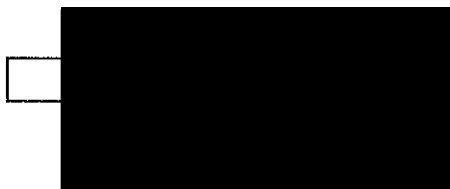


Yes, I wish to participate at the oral examination

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

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:



Date:

17-12-2014

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	4.43	Policy	Core Policy 7: Providing supporting infrastructure	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

X

No

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.

Paragraph 4.43 states that infrastructure delivery is important to ensure new development is sustainable, particularly across the science vale. This is where ~70% of projected jobs and 75% of strategic housing is allocated.

Essential highway infrastructure has been identified to support the identified growth across the Science Vale. Most of the identified improvements are to improve current roads via resurfacing or improving visibility, however the essential highway infrastructure does not address the capacity issues surrounding the A34, nor is there any flexibility within the Local Plan to relocate housing elsewhere if the transport network within the Science Vale fails or leads to nothing but gridlock.

The A34 has already been identified as a barrier to growth for the Science Vale. The SQW report states that Begbroke and Oxford will compete for the same business as Harwell Oxford Campus, and that the A34 is a major barrier to growth:

(SOURCE: http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf)

The URS Strategic Analysis of the Vale of White Horse Local Plan to 2031 Part 1 states: "**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.**" (SOURCE: URS, SA of the Vale of White Horse Local Plan to 2031, Appendix 14, SA3)

In addition, the increased traffic on the A34 poses further threats to the tranquillity and character of the AONB. SA 9 of the URS Strategic Analysis states, with regards to the proposed sites at the Harwell Oxford Campus "The site is adjacent to the A34 which could lead to increased traffic (and associated air, noise and light pollution), as well as amenity effects for residents nearest the road. **The site is in a sensitive location within the AONB which could have significant negative effects in terms of tranquillity of the AONB.** Relevant Core Policies 29 (Promoting Sustainable Transport and Accessibility) and 33 (Natural Resources) would apply to reduce the significance of pollution impacts; **however given the sensitivity of the AONB this is likely to remain a significant adverse effect.**" (SOURCE: URS, SA of the Vale of White Horse Local Plan to 2031, Appendix 11)

Furthermore, the "Science Transit and bus Study" for dedicated bus routes from Didcot to Harwell have confirmed that Section 4.2, page 15:

"The following additional locations are also expected to experience regular traffic congestion in future years, as residential and employment growth takes place across the Science Vale:

v. Hagbourne Hill, northbound approaching the A417 London Road, and southbound approaching the Chilton Interchange (A34/A4185);

vi. A4185 Newbury Road, southbound from the Harwell Campus to the Chilton Interchange and the bridge across the A34 at the Chilton Interchange".

These impacts are significant as the **ONLY** access Chilton residents have to their village is from the access roads adjoining the A4185 at the Chilton Interchange.

Given that the A34 has been identified as a major barrier to economic growth, and that there is a likelihood that development at the Harwell Oxford Campus would add to traffic issues on the A34, it would appear premature to proceed with large strategic housing allocations within the protected landscape of the North Wessex Downs AONB until (a) there is a proven track record of economic growth in the area (b) issues surrounding capacity on the A34 have been addressed and (c) it has been proven that housing must be located in this area with a full analysis as required by the NPPF paragraphs 115 and 116.

(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, and protect the North Wessex Downs AONB, the following modifications are necessary:

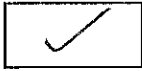
- Remove the entire allocation of 850 homes from the Harwell East Campus.
- Remove the additional allocation of 150 homes from the North West Harwell Campus (eg reduce the number of houses from 550 to 400 (including the 125 already given outline permission)).
- Include provision of up to 400 new homes 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.

Only by implementing these steps in full will the Local Plan be compliant with the NPPF paragraphs 115, 116 and the CROW Act 2000. Furthermore, the removal of the housing developments within the North Wessex Downs AONB will likely lead to less people commuting out of the AONB than would be commuting in for work at the Harwell Oxford Campus.

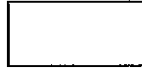
Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original 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

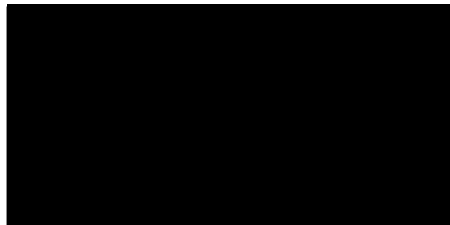


Yes, I wish to participate at the oral examination

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

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:



Date:

17-12-2014

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	5.59	Policy	Core Policy 15: Spatial Strategy for the South East Vale	Proposals Map	
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4. Do you consider the Local Plan is

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

X

No

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.

Paragraph 5.59 states that the provision of new housing in this area will help to improve the self-sufficiency of the South East Vale and provide opportunities for living closer to places of work. The "How the South East Vale Sub-Area will change by 2031" statement, page 68, says "New housing at

the Harwell Oxford Campus will have provided an exemplar development and function as a thriving community, successfully integrated with the science campus and provide accommodation for many of the site's employees."

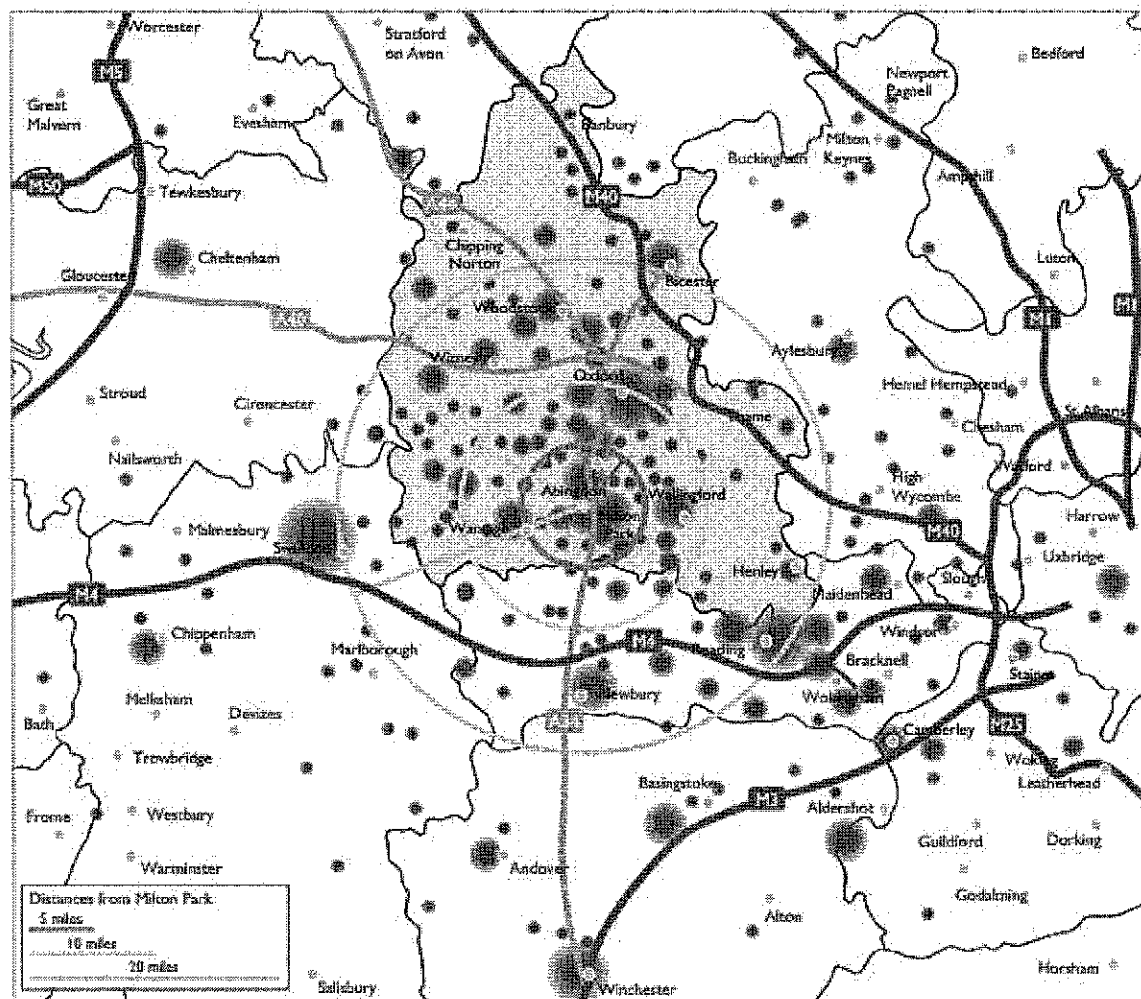
The current Chilton demographic indicates that only ~12% of Chilton residents actually work at the Harwell Oxford Campus (SOURCE: Petition against the Harwell East Development submitted to the VWHDC in Feb 2014).

Nationally, the average commuting distance was 15km in 2011 (2011 census). Furthermore, the 2001 census for the Harwell Ward indicated that 95% of employees in Harwell did not live in Chilton or Harwell villages.

Figure 6.1 in The Milton Park Travel Survey 2012 demonstrates that employees at Milton Park travel vast distances, with significant numbers of employees travelling from Winchester, Swindon, Reading, Abingdon, Oxford, Bicester and Witney.

Given that people choose to live in a specific area for a multitude of different reasons, it seems presumptuous for the VWHDC to assume that "many of the Harwell Oxford's employees" will choose to live on the campus. Indeed, current and historical records and current Chilton demographic demonstrate that this is not the case and therefore is poor justification for an unprecedented level of housing within the AONB.

FIGURE 6-1: Milton Park – daily travel to work pattern 2012



Source: Milton Park Travel Survey, MEPC (Based on response from 134 companies on site in Winsor, 2012.)

The average commuting distance within the Vale of White Horse, as at the 2011 census, is 15.9km, with the corresponding figure for South Oxfordshire being 17.2km. It is therefore reasonable to expect that people will continue to commute to the Harwell Oxford Campus from Reading, Abingdon, Newbury and Reading.

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

In addition, up to a 20% a price premium is applied to housing within the North Wessex Downs AONB compared to the same style of house by the same house builder at Great Western Park in Didcot. A summary of the price premium applied by David Wilson Homes for living in Chilton compared to Didcot is provided below:

- The "Chelworth": £530,000 at Chilton, £439,995 at Didcot
- The "Holden": £485,000 at Chilton, £425,000 at Didcot
- The "Cornell": £415,000 at Chilton, £390,000 at Didcot

Further to this, the URS Strategic Analysis of the Vale of White Horse Local Plan to 2031 Part 1 states:

" 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."

(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.

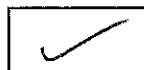
In order to make the Local Plan sound and legally compliant, the following modifications are necessary:

- Remove the entire allocation of 850 homes from the Harwell East Campus.
- Remove the additional allocation of 150 homes 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:
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 - (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.

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:

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:

Date:

17-12-2014

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	5.42	Policy	Core Policy 13: The Oxford Green Belt	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	X	No	
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	X
4 (3) Complies with the Duty to co-operate	Yes	X	No	

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.

Core Policy 13 relates to protecting the Oxford Green Belt, which was designed to prevent urban sprawl around Oxford, and to preserve the rural setting and special character of the city of Oxford.

However, there is no Core Policy relating to the protection of the North Wessex Downs AONB, and in particular how the VWHDC have/have not complied with the NPPF paragraphs 115 which 116, and also the CROW Act 2000, Section 85 which places a legal obligation on the VWHDC to protect the North Wessex Downs AONB.

Indeed, the North Wessex Downs AONB has a greater level of protection against development than the Oxford Green Belt:

"An AONB is in law equal to a National Park and a Local Authority (down to Parish Council level) are legally responsible for conserving and enhancing an AONB. There is no such legal protection for Green Belt. Green Belts are purely a form of local planning designation – they do not indicate the particular quality of a landscape. As such, Green Belt boundaries can be adjusted by Local Authorities to accommodate development if deemed necessary. AONB boundaries cannot be adjusted by Local Authorities given their national designation and legally protected status. Therefore AONB status is higher than Green Belt, it is the reason that AONB Units exist, and they have Management Plans as another requirement of the CROW Act 2000". (SOURCE: North Wessex Downs AONB Management Board)

Further to this, at the Council Meeting on 15th October 2014, where Councillors voted in favour of the Local Plan, The Head of Planning was asked the question "Which has the greater level of protection, the Oxford Green Belt or the AONB?". They could not readily answer this question, and two further questions were submitted to the council and answered, before he wrongly confirmed that the Oxford Green Belt had greater levels of protection than the AONB. The senior councillors present at the meeting did not correct this statement. If the senior planning officials at the VWHDC do not readily know that the North Wessex Downs AONB has a greater level of legal protection than the Oxford Green Belt, then the decision to allocate an unprecedented number of houses to two greenfield sites within the AONB makes the plan unsound.

(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 with NPPF 115, 116 and the CROW Act 2000, the following modifications are necessary:

- Introduce a Core Policy specifically relating to the Protection of the North Wessex Downs AONB, beyond what is covered in Core Policy 44: Landscape
- 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
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 - (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.

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:

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:

Date:

17-12-2014

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	<input type="text" value="6.111"/>	Policy	<input type="text" value="Core Policy 44: Landscape"/>	Proposals Map	<input type="text"/>
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4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

X

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

X

4 (3) Complies with the Duty to co-operate

Yes

X

No

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.

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.

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

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:

*"AONB/Alternatives in recognition of the landscape sensitivities of these sites a Landscape and 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.**"

(continue on another sheet)

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.

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.

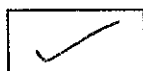
In order to make the Local Plan sound and legally compliant, the following modifications are necessary:

- Remove the entire allocation of 850 homes from the Harwell East Campus.
- Remove the additional allocation of 150 homes 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.

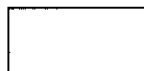
Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original 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.

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

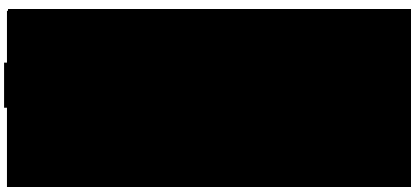


Yes, I wish to participate at the oral examination

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

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:



Date:

17-12-2014