

# **Examination in Public Statement Stage 1 - Matters and Questions**

**In respect of:**  
Matter 1 - Duty to Co-operate and other Legal  
Requirements

**At:**  
Land South of Harwell Oxford Campus

**On behalf of:**  
Mr & Mrs Carlisle





## 1.0 Response to Questions

- 1.1. McLoughlin Planning is instructed by Mr and Mrs Carlisle (hereafter referred to as the respondents) to make written representations to the Vale of White Horse Local Plan Examination in respect of their land interests adjacent to Harwell Oxford Campus.
- 1.2. This document sets out the respondents' position in respect of the Stage 1 questions posed by the Inspector for Matter 1, Question 1.2 only.

### **Question 1.2**

**Are the likely environmental, social and economic effects of the plan adequately and accurately addressed in the habitats Regulations Assessment and the Sustainability Appraisal (SA)?**

- 1.3. The respondents consider that the SA does not adequately and accurately address the environmental, social and economic effects of the Plan, specifically in respect to the development in and around the Harwell Oxford Campus. Whilst the respondents support the SA's conclusions that "no development" at Harwell Campus is not an option, they are of the view that it fails to consider the significant potential that is available by using the campus as a focus for new development. The Campus is recognised as a strategic employment site within the AONB. As the approach within the SHMA is to support Committed Economic Growth, it is the respondent's position that the investment in and around the Campus needs to be maximised.
- 1.4. Specific concerns are as follows:
- 1.5. The scope of the SA (paragraph 3.3) assumes the Plan will be implemented as written. However, Core Document HOU2 *Science Vale Housing and Employment Study* undertaken by GL Hearn Ltd on behalf of the Council has identified the population requirements required in order to support the SHMA's Committed Economic Growth scenario. This has identified that in 2011, the District's population in the Science Vale area was broadly the same as the rest of the District and as such is already a centre of employment and residence for a large population within sustainable locations. However, the preferred scenario set out that 11,850 new dwellings should be provided by the District within the Science Vale, against 8,800 elsewhere. The Strategic Sites allocated by the plan only account for 7,820 within the Science Vale (East and West) and as such, have not fully addressed the housing need and the environmental, social and economic effects of the required level of housing within the Science Vale area. Therefore, it remains to be seen as to how the SA can meet the above test in respect of its consideration of the Science Vale area.





- 1.6. SA paragraphs 12.3.4 onwards provide the justification for the need for housing within the AONB and acknowledges that there will be harm to the AONB, but that this is necessary and exceptional.
- 1.7. With regard to the Habitats Regulation Assessment, the document does not consider the environmental, social and economic benefits on SAC's within the area. It is not written in a way that identifies that the HRA is positively responding to the wider challenges of the Plan. For example, in the preliminary screening outcome for Policy 4, it draws heavily on the negative associations between new development and perceived impacts. Any benefits of development, such as mitigation or direct improvements caused by development are not even considered.

**Does the SA test the plan against all reasonable alternatives in terms of the overall requirement for land for housing and employment (see also Matters 2 and 4) and its broad spatial distribution (see also Matter 3)**

- 1.8. The respondents have no comments to make about the reasonable alternatives assessed for the overall requirement for land for housing and employment purposes, save for the fact that the Plan's housing target is supported as a starting point.
- 1.9. However, in terms of reasonable alternatives and the broad spatial distribution of housing, the respondents wish to make the following observations about the SA, specifically in respect of the board spatial distribution of housing in the Science Vale. The respondents' concerns relate to the level of development being directed to the Campus and consider that additional development should be provided or the Plan should re-visit the allocations made (which is for later stages of this EiP).
- 1.10. As a starting point, the following table summarises the Harwell Campus Landscape Study (July 2014) analysis of the sites around Harwell Campus that have been considered. Firstly, it is important to acknowledge that the development will have an effect on the AONB. Secondly, the sites considered have been taken from the SHLAA and have not considered all search areas around the Campus. Lastly, the table clearly shows that there are sites/search areas that the Council have dismissed which are of lesser or equal harm to the AONB and have prematurely been dismissed.

Site	L/S Sensitivity	Uniform	L/S Value	L/S Capacity	SHLAA
1	Med/High	No	Med/High	Low	Developable
2	Medium	No	Med/High	Med/Low	Developable
3	High	Yes	Med/High	Low	Undeliverable
4	Med/High	Yes	Med/High	Low	Undeliverable
5	High	Yes	Med/High	Low	Undeliverable
6	Med/High	Yes	Med/High	Low	Undeliverable
7	Med/High	No	Med/High	Low	Undeliverable

- 1.11. Looking at the assessment of L/S Sensitivity and L/S value, it is clear that this is a sensitive area landscape and that there is considerable uniformity in that sensitivity





across all sites considered (1 and 2 are allocated and 7 forms part of the respondents' site). However, the need to release land for development around the Campus has to be weighed up in the overall planning balance. Specific commentary on the SA is set out below:

- Paragraphs 12. 1 to 12.1.13 in the SA deal with the issue of alternative to directing development to the Campus. However, the SA does not actively consider the question of directing additional development to the Campus, over and above what has already been allocated in the Plan.
  - Paragraphs 12.2.1 to 12.2.5 only deal with considering alternatives within the allocated sites. The respondents' position is that all the land around the Campus should have been subject to a comparative site assessment exercise to the same detail as what has been done for the allocated sites.
  - Given the established need to accommodate housing at the Campus, it is considered that the SA does not fully address the alternatives of accommodating additional housing at the Campus or alternative sites around the Campus (see paragraphs 12.2.6 and 12.2.7 of the SA).
- 1.12. The respondents support the use of the Science Vale Ring Fence. This approach has been widely used by other local authorities to ensure that the delivery of housing is in locations that support the sustainable economic growth of areas. Section 13 of the SA discussed the ring fence and that the SHMA identifies that *"almost 70% of the 23,000 new jobs forecast for the District to 2031 are likely to be located in the Science Vale area."*
- 1.13. The main concern with the SA is that the preferred option, and the alternatives, have not considered the delivery of the full housing need for the Science Vale and the Harwell Campus. Whilst the SA acknowledges that the level of jobs needed for the Science Vale, as set out above, the plan has not ensured that the full OAN will be met within the Science Vale.





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