

15 April 2015

working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Planning Policy Joint Projects Team
South Oxfordshire and Vale of White Horse District
Councils
c/o Vale of White Horse District Council
Abbey House
Abbey Close
Abingdon
OX14 3JE

Dear Sirs,

**RE: Consultation: Science Vale Area Action Plan: Issues and Scope Document,
April 2015**

We write on behalf of the Campaign to Protect Rural England's **Vale of White Horse District** and **Wallingford District** to provide comments on the above document.

General considerations

As you will be aware, CPRE is wholly opposed to what it sees as unjustified and unsustainable development as proposed, following publication of the SHMA, in the Local Plans of the District Councils. In particular, we believe that it will result in targets which, as well as being undesirable, will be impossible to meet.¹

We are concerned that it will give free rein to developers to bring forward inappropriate greenfield sites, whatever the will of the District Councils.

The reader should see our comments below as containing our best attempts to create an Action Plan which will combat this unfortunate scenario.

A further important strand in our work is to try best to defend the Green Belt and AONB, both of which are generally accepted, in particular in the NPPF, as requiring very exceptional circumstances to disturb in any way. There is a general lack of

¹ See [Unsound & Unsustainable: Why the SHMA will increase greenfield use but not meet housing needs](#) - A critique of GL Hearn's April 2014 Oxfordshire Strategic Housing Market Assessment (SHMA) Urban & Regional Policy, May 2014

precise statements containing the words 'Green Belt' and 'AONB' (Area of Outstanding Natural Beauty). This needs to be corrected.

Our concern is that inclusion within the Science Vale will undermine the existing protections offered by Green Belt and AONB status. Whilst we accept that there is an interaction between the surrounding villages and the main centres, we are nervous that blanket inclusion within the Science Vale area will lead to inappropriate development applications within small communities.

No parts of the AONB or Green Belt should be included in the Science Vale Area, save as identified for development in the Local Plans to 2031.

A general view

We should like to say at the outset that many statements made by the Councils in the document under consideration are in line with our thinking. We welcome that and applaud your statement in the last bullet point of 3 on page 21, where the Councils state that they must 'Protect the distinctive character and heritage of Science Vale's market towns, villages and countryside'. However, the document is often phrased in very general terms and requires more detail (even at this Issues & Scope stage) to provide such protection.

There is also the need to explain more precisely how such requirements will be monitored. In particular, assurances need to be given concerning the Green Belt and the AONB.

Opening Pages

1. Page 4 - the opening vision. We welcome the acknowledgement of the attractive countryside as an asset for Science Vale and the commitment to maintain and improve it 'to support a high quality of life for residents'. However, it is not just about people but wildlife and broader biodiversity too. We would propose adding '*and valuable biodiversity*' to the end of the final sentence.
2. Page 10, lines -7 to -4, we look forward to seeing the detail as to what is not considered appropriate development and to discussing that.

Question1: Area Action Plan Boundary

3. We consider this to be of crucial concern. From our point of view, **no part of the AONB or Green belt should be included in the Area, with the sole exception of sites identified in Local Plans to 2031.** In the Councils' document there are large swathes of AONB within the specified boundary. These parts of the AONB should retain the same degree of protection as all other parts of all AONBs.

Question 2: Issues

4. Page 14, Issue 1, we look forward to seeing and discussing the design principles and design briefs. A major concern is **how major developments will retain a variety and character which will avoid a mediocrity and sameness** that will make them wholly undesirable and unacceptable.
5. Page 15, Issue 3, and Appendix 3, Science Vale Employment Strategy - though we see that some general business will have to accompany the main aims of developing a Science Vale, it will be important to ensure that they should be **kept to an absolute minimum**. CPRE supports the concerns raised around storage and warehousing which should be wholly resisted as adding significantly to transport infrastructure already at or near capacity, and likely to have considerable landscape impact whilst still offering relatively low density employment.
6. Page 16, Issue 4, the aim 'to improve access to green infrastructure and the countryside' is welcome. However, 'improving access' is only one element. We would like to see this section re-written to include a stated objective of protecting and improving our natural capital, including biodiversity and the landscape. Specific reference should be made to the AONB and Green Belt. .

Question 3 - Relative Importance of Issues

7. Yes, CPRE believes issue 4 - achieving growth without compromising the area's natural beauty and historic and rural character - is the most critical. We have a choice over where we bring forward development and create jobs. The countryside cannot move elsewhere! If we damage this environment, then we risk fundamentally undermining one of the 'foundations of success' that this document itself identifies.

Question 4 - Vision & Objectives & Question 5 - Scope of the Plan

8. Page 18, we look forward to hearing your proposals for Wantage, so that it 'will be enhanced'. The Vale of White Horse District Council has already stated that much of the development that is to go ahead would not have been approved if a Local Plan had been in place. Wantage and Grove are now to be overwhelmed by unsustainable development without the necessary infrastructure. In face of this, enhancement is a real challenge.
9. Page 19, 3, To ensure the villages in the AONB 'maintain their distinctive character', it is imperative that these **villages in the AONB and the area around them are not included in the Science Vale Area**.
10. Page 20, 1, fourth bullet point, 'Ensure land is available for...general business.' In our view it is important that land is not reserved for general business unless there is an established need for it to support specific 'big science', and we expect a clear statement giving the necessary protection.

11. Page 21, 3, title, replace 'maintain their distinctive character' by 'maintain and enhance their distinctive character'
12. Page 21, 3, second bullet point - crucial. **It is very important that the District Councils ensure they can refuse development that could degrade the built and natural environment in such a way that makes it impossible for an Inspector to overturn the refusal on appeal, especially in the circumstance that the District Councils are not meeting targets.**
13. Page 21, 3, fifth bullet point - also important. We look forward to discussing the Councils' proposals as to how they intend to 'achieve balanced and sustainable employment and housing growth'. We recommend the 'bit-by-bit' approach, monitored closely, to avoid housing rushing ahead of available employment, and employment rushing ahead of available housing - both of which would require unprovided transport and other infrastructure.
14. Page 21, 3, eighth bullet point - we welcome this aim to support the needs of people who wish to build their own homes in *appropriate* locations, as self-build properties in general tend to be built to be higher standards of sustainability.
15. Page 21, 3 - there is no specific mention of sustainability standards. Whilst this may be implied in a number of the bullet points, we think it would be appropriate to include a specific point outlining the overall high sustainability objectives that will be expected with regards to issues such as water conservation and renewable energy.

A specific objective acknowledging the need to protect the Green Belt and Area of Outstanding Natural Beauty should also be added.

16. Page 21, 4, bullet points 2 and 4 - it is important that **rail measures and targeted investment on roads are achieved before accompanying development is allowed to proceed**, for example, the funding of the western ring road at Wantage and the improvements to the A417 and the reopening of Grove station.

Appendices

17. Page 30, Appendix 3 - CPRE welcomes the proposal to bring forward a team of experts in various fields to prepare a spatial framework for Science Vale. However, we believe that as well as planners and property consultants, **this team must also incorporate environmental and Landscape and Visual Impact Assessment (LVIA) consultants.**
18. Page 31, Appendix 3 - Science Vale Green Infrastructure Strategy - we welcome the fact that the District Councils are currently preparing a joint Green Infrastructure Strategy which CPRE believes is well overdue. **This strategy must be in place before any final decisions are taken on the Science Vale Area Action Plan, to ensure that green infrastructure is not jeopardised and that any development can be guided appropriately.**

As a key stakeholder in both Districts, CPRE looks forward to discussing your proposals in detail as they develop.

Yours sincerely,

Richard Harding
(Professor R. Harding, Chairman, CPRE Wallingford District Committee)

Peter Collins
(Dr P.J. Collins, Chairman, CPRE Vale of White Horse Committee)