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| **New%20Image1** | **Local Plan 2031 Part 2**  Publication Version  Representation Form | | | | | | | | **Ref:**  **(For official use only)** |  |
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| **Name of the Local Plan to which this representation relates:** | | | | | | | | Vale of White Horse Local Plan 2031 Part 2 | |
| **Please return by** **5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) | | | | | | | | | |
| 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\* | |  |  |  |  |  | 2. Agent’s Details (if applicable) | | |
| \*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. | | | | | | | | | |
| Title | | Mrs | | |  | |  | | |
|  | | | | | | |  | | |
| First Name | | Helen | | |  | |  | | |
|  | | | | | | |  | | |
| Last Name | | Marshall | | |  | |  | | |
|  | | | | | | |  | | |
| Job Title (where relevant) | | Director | | |  | |  | | |
|  | | | | | | |  | | |
| Organisation representing | | CPRE Oxfordshire | | |  | |  | | |
| (where relevant) | | | | | | |  | | |
| Address Line 1 | | First Floor | | |  | |  | | |
|  | | | | | | |  | | |
| Address Line 2 | | 20 High Street | | |  | |  | | |
|  | | | | | | |  | | |
| Address Line 3 | |  | | |  | |  | | |
|  | | | | | | |  | | |
| Postal Town | | Watlington | | |  | |  | | |
|  | | | | | | |  | | |
| Post Code | | OX49 5PY | | |  | |  | | |
|  | | | | | | |  | | |
| Telephone Number | | 01491 612079 | | |  | |  | | |
|  | | | | | | |  | | |
| Email Address | | director@cpreoxon.org.uk | | |  | |  | | |
| **Sharing your details**: please see page 3 | | | | | | |  | | |

**Part B – Please use a separate sheet for each representation**

Name or organisation: CPRE Oxfordshire

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

Paragraph Policy Policies Map

15a & b and

And Sustainability Appraisal

4. Do you consider the Local Plan is: (*Please tick as appropriate)*

4. (1) Legally compliant No

No

4. (2) Sound NO No

4. (3) Complies with the Duty to Cooperate No

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| 5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments. |
| **Core Policy 15a: Additional Site Allocations for South-East Vale Sub-Area**  **Core Policy 15b: Harwell Campus Comprehensive Development Framework**  **& Sustainability Appraisal**  CPRE Oxfordshire is particularly concerned about the proposed housing allocation on the Harwell Campus of 1,000 new dwellings within theNorth Wessex Downs Area of Outstanding Natural Beauty (AONB), and the harm that will be done to the AONB.  We welcomed the Inspector’s decision in his examination of Local Plan Part 1 that the two major housing development sites adjacent to Harwell Campus and within the AONB (850 houses ‘East of Harwell Campus’ and 550 ‘North West of Harwell Campus’) were unsound and recommended for deletion from the Plan.  The Inspector was very clear in his report on his rationale for this recommendation. These are set out under ‘Issue 5 – whether or not the plan sets out a soundly-based strategy for the South-East Vale Sub-Area, including whether or not the housing allocations proposed in the North Wessex Downs AONB are soundly-based.’  In particular, the Inspector notes that the housing allocations, totalling 1,400 new dwellings within the AONB ‘*would be a major development which the NPPF indicates should be refused in an AONB other than in exceptional circumstances and where it can be demonstrated it is in the public interest*.’ (Para. 112)  Paragraph 116 of the NPPF states:  *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* * *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*   Concluding his assessment, the Inspector notes ‘*In summary the need for development of sites 12 and 13 for housing has not been demonstrated and, having regard to the potential for mitigation, it would be likely to cause some harm to the landscape of the AONB and the recreational opportunities it offers*.’  And concerning planning applications that would have to come forward for such developments, the Inspector notes ‘*I consider it unlikely that the exceptional circumstances necessary to approve such an application would reasonably be considered to exist. Consequently, the plan’s housing allocations on sites 12 and 13 are not soundly-based*.’ (Para. 121)  Yet, despite the Inspector’s decision, the Vale nevertheless proposes in Local Plan Part 2 the allocation of 1,000 new dwellings within the AONB on the Harwell Campus.  The proposed site straddles the Icknield Way – the central section of an ancient route with a claim to be the ‘oldest road in Britain’.  IF the proposed housing development is approved, the development MUST take into account the importance of the Icknield Way as an historic route and it should be protected from any damaging impact caused by the proposed development.  The proposed site is in part (approx. two thirds) on land confirmed in the adopted Local Plan Part 1 as allocated for development as employment land (this includes a large area of open greenfield land in the north-west corner of the site).  The site is also in part (the balance of the site, north of the Icknield Way) on land proposed as part of a strategic housing allocation site in Local Plan Part 1 for new housing (550 dwellings ‘North of Harwell Campus’), which was deleted by the Inspector as unsound due to the harm that would result on the AONB, and that it was contrary to the statutory objectives of the AONB and provisions in the National Planning Policy Framework (NNPF).  The Vale says ‘*It has been demonstrated that the proposed residential development at Harwell Campus would have limited impact on the landscape setting of the AONB and those limited impacts that have been identified are capable of being successfully mitigated*.’ (Para. 2.116).  This claim is based on the report by Hankinson Duckett Associates, summarised in the ‘Harwell Campus “Exceptional Circumstances” Report to the Vale of White Horse District Council’:  However, in the HDA’s Landscape and Visual Appraisal, they conclude:  *‘Development of the proposed housing allocation would have some initial adverse effects, notably on the character of the land within the site to the north, land located to the immediate north of the site and from four public footpaths which have existing views of the site.’*  *It goes on to say: ‘There would be initial adverse effects on the recreational experiences of people using the Ickhnield Way, Hungerford Road and Winaway.’*  According to the HDA report, these ‘adverse effects’ would not be mitigated for some 10-15 years!  Commenting on the proposed development of housing within the northern part of the Campus, the Inspector notes in his report that while ‘*the development of housing within the northern part of the Harwell Campus*’ … ‘*would be significantly less harmful to the landscape of the AONB than the development of site 13 and would, in part, have the benefit of recycling previously-developed land’*, he went on to say ‘*However, it would involve the development for housing of land recently designated as Enterprise Zone and would reduce the amount of employment land available at the campus*.’  This is significant in light of the Vale’s own recognition that ‘*it is … crucial that employment development on the Enterprise Zone continues to be supported*.’ (Para. 2.112). The proposed housing allocation is on land that is designated for employment use through Local Plan 2011 Saved Policy E7 and Core Policy 6.  The Inspector concluded ‘*Moreover, and fundamentally, given that the need for housing in the AONB has not been demonstrated I conclude that the exceptional circumstances necessary to approve such a development would also be unlikely to exist*.’ (Para. 122). (Our emphasis).  **To summarise, we can see no clear evidence that the specific issues raised by the Inspector in his rejection of the proposed housing developments within the AONB have been addressed in Local Plan Part 2.**  We do not believe the need for development of this site for housing has been demonstrated and we consider that it would be likely to cause harm to the landscape of the AONB and the recreational opportunities it offers.  We understand that one of the ‘main issues’ that arose from the Preferred Options (Regulation 18) consultation included ‘*concern … that there was a lack of evidence published to demonstrate the exceptional circumstances to justify development at Harwell Campus, located in the AONB*.’  As far as CPRE is concerned, there *continues* to be a lack of evidence published to demonstrate the exceptional circumstances to justify development on the Harwell Campus in the AONB, and as such, we are unclear why the Vale Council has chosen to retain the proposed site allocation of 1,000 houses at Harwell Campus in the Publication Version of its Local Plan.  **There is no clear justification that the number of new dwellings and its location within the Harwell Campus is sufficiently important to meet the NPPF tests (in particular, exceptional circumstances and public interest) to overcome the national planning policy requirement that major developments should not be permitted within the AONB.**  **Moreover, we are worried that if the proposed site allocation were to be approved, it would set a dangerous precedent for further ‘major developments’, not just within the North Wessex Downs AONB, but in other AONBs.**  New independent research by National CPRE ‘Beauty Betrayed’ (November 2017), shows that there has been an 82% increase in new housing units given planning permission in England’s 34 AONBs in the past five years, despite the fact that national planning policy gives them ‘the highest status of protection’ from damaging development. This is a five-fold increase since 2012 in the amount of AONB land set to be lost to development.  The North Wessex Downs is one of just eight AONBs which account for 74% of all housing applications in AONBs and 79% of all approvals in AONBs from 2012-2017.  IF the proposed allocation is approved, it would become the largest housing development within an AONB nationally (currently, the largest housing development approved in an AONB is at Peace Pottage, High Weald AONB, for 600 houses).  **In conclusion, we consider the proposed new site allocation within the AONB would be harmful to the AONB objectives, would not constitute sustainable development and would not meet the statutory provisions and national policy measures designed to safeguard the special qualities of the AONB.**  **New Policy relating to North Wessex Downs Area of Outstanding Natural Beauty**  Given that a considerable percentage of the Vale of White Horse District lies within the North Wessex Downs Area of Outstanding Natural Beauty, CPRE believes that the current Plan cannot be considered sound unless it includes a policy addressing the specific development requirements of this designation.  **CPRE proposes the following wording to replace NE6 relating to the North Wessex Downs Area of Outstanding Natural Beauty:**  *‘In determining development proposals within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and proposals which would affect its setting, great weight will be given to conserving and enhancing the area’s natural beauty, landscape and countryside, including its wildlife, historic character and heritage assets. The North Wessex Downs AONB Management Plan and guidance documents are material considerations in decision making relevant to the AONB.*  *Major development will not be permitted within the AONB unless it satisfies the exceptional circumstances set out in national policy and guidance.*  *Proposals that support the economy and social well-being of communities located in the North Wessex Downs AONB, including affordable housing schemes and small scale renewable energy development, will be supported, provided they are consistent with the great weight that must be given to conserving and enhancing the landscape and natural scenic beauty of the area.’*  (See: CPRE’s submission re: Chapter 3 – Development Management Policies).  **Sustainability Appraisal**  The SEA Regulations, which underpin the Sustainability Appraisal process, indicate that stand-alone consideration should be given to ‘cumulative effects’, ie, effects of LPP2 in combination with other plans. (Para. 11.1.2).  However, CPRE is concerned that the Sustainability Appraisal gives short shrift to the ‘cumulative effects’ of LPP2 and LPP1 allocations, as well as other local plans in the sub-region, on the North Wessex Downs AONB.  The Sustainability Appraisal is supposed to consider the ‘*In-combination impacts at the ‘larger than local’ scale of the North Wessex Downs Area of Outstanding Natural Beauty (AONB).*’ (Para 11.1.6).  But instead of giving due ‘consideration’ to the in-combination impacts at the larger than local scale of the NWD AONB, the Vale seems to have thrown its hands up in the air, saying ‘it is difficult to envisage in-combination effects’. (Para 11.1.6).  Moreover it says ‘*it is understood that other local plans (the AONB straddles three unitary authorities and four district councils) are giving consideration to options involving major development in the AONB*.’  This seems to imply because there are other local plans ‘giving consideration to options involving major development’ elsewhere in the NWD AONB, this justifies the Vale’s proposed development on the Harwell Campus in the NWD AONB.  The CPRE report (mentioned above), reveals the extent to which AONBs across the country are facing housing development pressures despite their ‘protected’ status. Of the eight AONBs under most pressure, three are in Oxfordshire, including the North Wessex Downs.  In the last five years, approval has been given to 100 new homes on greenfield land in Hungerford, Berkshire, in the North Wessex Downs, despite no ‘exceptional circumstances’ having been demonstrated. Similarly, in Marlborough, Wiltshire, in the North Wessex Downs, approval was given for 167 homes and a hotel on greenfield land, despite landscape impact.  The CPRE report highlights how important it is for Councils such as the Vale to give due consideration to the ‘in-combination’ impacts of proposed developments at the larger than local scale of the NWD AONB.  **We strongly recommend, in unison with the North Wessex Downs Unit, that there should be a strategic approach to potential impacts on the North Wessex Downs AONB. As such, the SA should include ‘*an estimate of the overarching cumulative impact of proposed site allocations on the AONB objectives, and taking account of developments in adjacent areas, such as the wider Didcot area*.’ (NWD Unit submission to LPP2 Preferred Options).**  **As the NWD Unit says ‘*This, we believe, would be fully in line with the iterative nature of the SA process. It would provide a helpful indication of the scale and direction of the overall effects on the AONB and its setting of implementing the Vale of White Horse Local Plan 2031, having due regard for those of developments in neighbouring areas. This, we believe, would inform and contribute to an examination of the soundness of the Plan*.’ (NWD Unit submission to LPP2 Preferred Options).**  (Continue on page 4 /expand box if necessary) |

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| 6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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. |
| We believe the allocation of 1,000 new dwellings on the Harwell Campus within the North Wessex Downs Area of Outstanding Natural Beauty to be unsound and recommend its deletion from the Plan.  (Continue on page 4 /expand box if necessary) |

**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?

**Yes**, I wish to participate at the

oral examination

YES

|  |
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| 8. If you wish to participate at the oral part of the examination, please outline why  you consider this to be necessary:  CPRE represents the views of its members across the District, is well-informed on the issues and  would wish to contribute to any related discussion. |
| ***Please note*** *the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.* |

xxx

Signature: Date:

**Sharing your personal details**

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

**Representations cannot be treated as confidential and will be published on our website alongside your name.** If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

**Would you like to hear from us in the future?**

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

**Further comment:** Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

**Alternative formats of this form are available on request.** Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)

**Please return this form by** **5pm on Wednesday 22 November 2017 to:** Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk)