 <p>Vale of White Horse District Council</p>	<p>Vale of White Horse Local Plan 2031 Part 2: Preferred Options</p> <p>Comment Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to the Planning Policy Team, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton OX14 4SB, or email planning.policy@whitehorsedc.gov.uk no later than 5pm on Thursday 4 May 2017.

This form has two parts –

Part A – Your Personal Details
Part B – Your Comments

Local Plan 2031 Part 2 Comment Form

The Vale of White Horse District Council are welcoming comments on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites through our preferred options consultation. The aim of Part 2 is to set out:

- policies and locations for the Vale's proportion of Oxford's housing need up to 2031
- policies for the part of Didcot Garden Town that lies within the Vale of White Horse district
- detailed development management policies to complement Part 1 and replace the saved policies of the Local Plan 2011
- additional site allocations for housing.

This consultation is running for 8 weeks from **Thursday 9 March 2017 to 5pm on Thursday 4 May 2017**. All comments will be taken into consideration if submitted within the consultation time frame.

Submitting Comments

Please fill in this form and return by:

- email to: planning.policy@whitehorsedc.gov.uk

OR

- post to: Planning Policy
Vale of White Horse District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

Comments must be received by **5pm on Thursday 4 May 2017 precisely**.

Please complete a separate form (Parts A & B) for each Local Plan 2031 Part 2 Planning Policy, supporting text and/or Strategic Site you are commenting on.

Please clearly identify which Planning Policy your comments refer to using the reference (i.e. DP1 and/or Page or Chapter number) in the Local Plan 2031 Part 2.

Please do not repeat your previous comments. The council will review any comments you have previously submitted.

Part A: Your Details

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	<input type="text" value="Mrs"/>	<input type="text"/>
Last Name	<input type="text" value="Morris"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Parish Clerk"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="Chilton Parish Council"/>	<input type="text"/>
Address Line 1	<input type="text" value="6 Latton Close"/>	<input type="text"/>
Line 2	<input type="text" value="Chilton"/>	<input type="text"/>
Line 3	<input type="text" value="Didcot"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text" value="OX11 0SU"/>	<input type="text"/>
Telephone Number	<input type="text" value="01235 834233"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text" value="parishclckchilton@btinternet.com"/>	<input type="text"/>

If you do not wish to be informed of future updates to the Local Plan or other planning policy consultations in your area, please tick this box

PLEASE NOTE THAT YOU MUST PROVIDE YOUR NAME AND ADDRESS FOR YOUR COMMENTS TO BE CONSIDERED. BY COMPLETING THIS FORM YOU AGREE TO YOUR DETAILS BEING SHARED AND YOUR NAME AND COMMENTS WILL BE MADE AVAILABLE FOR PUBLIC VIEWING. THESE COMMENTS CANNOT BE TREATED AS CONFIDENTIAL.

Part B – Please use a separate sheet for each representation

Name or Organisation :

Chilton Parish Council

The Vale of White Horse District Council are welcoming comments on the Local Plan 2031 Part 2: Detailed Policies and Additional Sites through our preferred options consultation. We would like to hear your opinions on:

- the policies contained within this Plan
- the additional site allocations
- any recommendations you may have for alternative sites
- any improvements to the Local Plan Part 2 supporting text or policies that you believe will help to improve/strengthen the Local Plan.

If you are commenting on more than one policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

3. Please state in the boxes below the Planning Policy or Site reference you are commenting on.

Planning Policy reference – PP:
Chapter Number:

Chapter 2, including Core policies 15A and 15B

4. Please make your comments on this Planning Policy or Site in the box below:

Local Plan Part 2031 Part 2 consultation response from Chilton Parish Council

This document sets out the response of Chilton Parish Council ('The Council') to the VWHDC Local Plan 2031 Part 2 consultation.

Executive Summary

- Chilton Parish Council is not opposed to housing on the Harwell Campus but it should be restricted to brownfield sites and be demonstrably only for Campus employees and their families. The Allocated Site comprises an Employment Zone, an Enterprise Zone and some Greenfield land and as such is not a logical candidate for 1000 dwellings. The Allocated Site is in an AONB where sites were rejected in Part 1 as they failed to demonstrate exceptional circumstances.
- The 1000 dwelling allocation comprises three elements:
 - 1) Housing for Campus Employees
 - 2) Housing for the wider Science Vale
 - 3) Open Market Housing
- Only No 1, Housing for Campus employees, could arguably meet the exceptional circumstances test for this AONB site and the evidence so far provided for this is thin.
- Housing for Campus employees is best defined in terms of `Housing Units` and not dwellings.

The Council's principal concerns in the Local Plan Part 2 centre on the proposed 1000 unit Harwell Campus housing allocation. This would have a significant impact on Chilton Parish and is described in Ch.2, Core Policies 15A and 15B and the associated Appendix A. Our concerns are as follows:

See accompanying text for rest of this submission on this Chapter/Core Policies
(continue on a separate sheet/expand box if necessary)

If you wish to comment on another policy or site please complete one form (Parts A and B) for each policy or site you are commenting on.

5. Please set out what change(s) you consider necessary.

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.

See details in accompanying submission

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

6. Do you have any comments on the Sustainability Appraisal or Habitats Regulations Assessment in respect of the Local Plan 2031 Part 2?

No

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

PLEASE RETURN THIS FORM BY 5PM ON THURSDAY 4 MAY 2017

Please note your comment should cover succinctly all the information, evidence and supporting information necessary to support/justify the comment and the suggested change.

PLEASE NOTE THAT BY COMPLETING THIS FORM YOU AGREE TO YOUR DETAILS BEING SHARED AND YOUR NAME AND COMMENTS WILL BE MADE AVAILABLE FOR PUBLIC VIEWING. THESE COMMENTS CANNOT BE TREATED AS CONFIDENTIAL.

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The Council's principal concerns in the Local Plan Part 2 centre on the proposed 1000 unit Harwell Campus housing allocation. This would have a significant impact on Chilton Parish and is described in Ch.2, Core Policies 15A and 15B and the associated Appendix A. Our concerns are as follows:

1. The principle of major housing developments in the AONB

The question of large housing developments within the North Wessex Downs AONB was comprehensively assessed as Issue 5 during the Examination in Public (EiP) of the Local Plan Part 1 in 2016. The relevant paragraphs of the Inspector's Report (Paras 112-124 inc. + Para 135) are set out verbatim, for reference, as our Appendix at the end of this submission.

In his assessment, the Inspector noted that no written evidence had been provided to quantify, in terms of job creation, the economic importance of either permitting or refusing housing development in the AONB. Observing the diversity of Harwell Campus employment (>150 companies in addition to 6 large public sector organisations) the Inspector noted that clearly these people had been attracted to work at Harwell notwithstanding the lack of housing at the Campus and thus the need for housing generally within the AONB and specifically on sites 12 and 13 (which were to be located within the AONB but outside the Campus footprint) had not been demonstrated.

The Council observes that the Inspector's view has not been accepted and, explicitly, the clear strategic intention remains to insert a major development in the AONB.

2, Campus accommodation requirements

The Inspector also addressed the question of the evolution of the Campus itself into a work-live-play community, noting that no convincing evidence had been presented to indicate that any existing or new employers at Harwell would in the future not be equally successful in attracting people to work there. This would be as long as there is sufficient, suitable housing within the Science Vale area generally. Submissions to the EiP did suggest that there may be a need for Campus-based university-style accommodation such as that described in the Oxfordshire Strategic Economic Plan (SEP). The latter refers to the development of a Research Village at the Campus to create the "...feeling of a campus-based university with 5 accommodation blocks (each with up to 40 bedrooms with shared kitchen facilities on each floor and 5 self-contained apartments for those visiting for longer periods)...". This is very different from the c.1,000 **dwellings** proposed in the Part 2 plan, and no evidence is presented to overcome the Inspector's statement.

The Inspector also observed (Para 122) that an alternative proposal to Housing Allocation Site 13 had been put forward, involving development for housing within the northern part of the Harwell Campus itself. This has been translated into the proposed Harwell Campus Comprehensive Design Framework described in Ch.2 (pp 50-53) by the subterfuge of arbitrarily extending the Strategic Employment Zone (see below). However, as the Inspector noted, this site (which partially subsumes the Site 12 which was withdrawn after the EiP) would involve development for housing of land recently designated as Enterprise Zone and also lie within the Local Plan's Harwell Campus Strategic Employment Zone (SEZ), thus reducing the amount of employment land available at the Campus.

Again, the arguments presented in Para 2.98 repeat the arguments that were made in Part 1 (which were rejected by the inspector), and concludes:

"The Campus is compiling a suite of further evidence to demonstrate the need for and 'exceptional circumstances' for delivering residential development at Harwell Campus. This will be published at the next stage of preparing the Local Plan."

In the Council's view, justification for the allocation of 1,000 houses on Campus land will first have to depend on this further suite of evidence, which has not yet been provided.

3. Misleading change in SEZ

We note that in the Part 2 plans, the SEZ has since Part 1 been deliberately expanded north of the former Icknield Way boundary (see Figure 1 below). This major change in a Part 1 strategic planning zone has been done without acknowledgement or due process, preventing appropriate consultation. While it presumably allows the land in question to lie 'within the Campus', it simultaneously excludes that land from a future employment use by re-labelling it for housing.

The Council finds this an unhelpful and misleading device. Our view is that if the Employment Zone (which by definition surely is to allocate land for employment purposes) is to be thus extended, then it can only be for the work-live-play Campus employee accommodation so eloquently described in the Harwell Campus Comprehensive Design Framework, not for some larger off-site support of Science Vale employment outside the AONB. There can be no other justification for this extension of the SEZ.

4. Incursion of housing element into Enterprise Zone

The Council notes that the (unnecessarily) large area demarcated for housing within the Campus boundary includes land south of the Icknield Way which lies within the statutorily defined Enterprise Zone (EZ). EZs were expressly designed by Central Government to promote and accelerate economic development and the only possible justification for devoting so large a proportion of this EZ (29% by area) to a residential land use would be to provide employment-related accommodation for the rest of the EZ and the adjacent Campus.

If so it is even more important to ensure that the amount of land thus assigned (not far short of a third) is no larger than is necessary for that purpose, in order to not overly restrict the employment promotion advantages that this central-government-supported Enterprise Zone location offers.

5. Core Policy 15a; SE Vale Sub-Area over-allocation

This policy tabulates the housing requirements for the plan period (12890) and then lists how this requirement is to be met. That list includes the 1000 'dwelling' Harwell Campus allocation as well as sites elsewhere in Science Vale/SE Area and totals 13571. **The result is thus an over-allocation of 681 dwellings.** It would be perfectly practicable to halve the Campus allocation and still:

- (i) provide the "bespoke housing types and tenures tailored specifically to meet the identified needs of the Campus", described in Para 2.77 of Additional Sites and Sub-Area Strategies
- (ii) achieve a community size that would trigger necessary infrastructure investment e.g. new primary school, local shopping and recreational facilities
- (iii) keep a sizeable over-allocation margin of more than 180 dwellings.

The Council agrees with the vision for the Harwell Campus as set out in Paras 2.83-2.97 with the following important amendment;

“2.92 The development of a new neighbourhood at the Campus offers the opportunity to create a purpose-built environment, tailored towards the housing needs of the Campus ~~and the local science community.~~”

6. Ch.2 Harwell Campus Comprehensive Design Framework

The Council has carefully read the Comprehensive Design Framework and can from its arguments appreciate that there may be both a potential need and some sustainability merit in adding to the residential element of Harwell Campus. We note first though that there is already a limited range of on- or near-Campus residential accommodation. This includes hostel-type housing on-site and mixed open market and affordable housing on former UKAEA land immediately adjacent to the Campus (Chilton Field, North Drive). Campus employment expansion of the extent projected, if realised, would justify a mix of university type accommodation (blocks with shared kitchen facilities on each floor, self-contained apartments for those visiting for longer periods) and predominantly rental housing for families, much as envisaged in the Oxfordshire SEP.

But to justify the exceptional circumstances any expansion of residential use must, in the Council's view, meet a sustainability criterion for major residential development within the AONB viz.; **The accommodation must in both design and tenure cater exclusively for employee needs of the Campus employers and not become a commuter implant.**

Also, there is no timescale laid down for the provision of the Framework, nor any conditionality, such as not considering any application until the Framework is in place.

The list of items to be included in the Framework is far too vague and must be extended to include justification for the support of the work-live-play community, and what housing mix will be allowed. There should be specific provision to exclude market housing which is not linked to Campus employment. The wording in the plan and the subsequent framework(s) must be strong enough to ensure that this site never becomes a rural commuter urbanisation

With that criterion in mind the Council cannot see why the proposed allocation refers to 1000 dwellings rather than 1000 bedspaces/bedrooms. We find it a remarkable omission from the Harwell Campus Site Specific Requirements in Appendix A that the nature of the accommodation types needed to serve the employment needs of this site are not more clearly defined, as they are so distinctly different from those that would occur in a typical open-market + affordable housing large development elsewhere in the Vale. Merely describing the housing as 'exemplar' is meaningless. This lack of clarity is a serious omission.

As the EiP has pointed out, housing requirements from employment generated elsewhere in the Science Vale can be accommodated within/close to Science Vale but outside the AONB. There are NO exceptional circumstances that would justify the addition of an open-market housing element on the Campus, consistent with the Inspector's views in Paras 116-122 of the EiP report.

A requirement for an allocation of this size for the Campus alone has not been demonstrated and appears excessive. In our view the Harwell Campus Comprehensive Design Strategy (CDS) and the corresponding Appendix A Development Template are not sufficiently clear on this point by confusing 'dwellings' with 'accommodation'.

We therefore oppose the number of 'dwellings' envisaged as no evidence has been provided that such a large number is required for to meet Campus requirements (the sole justification for exceptional circumstances that an AONB location requires under the NPPF).

If the housing allocation is really intended to meet employee/visiting research worker needs then either the descriptor should be re-worded (as bedrooms/bedspaces) or the allocation reduced to more realistically reflect the broader mix of residential hall, short-term rented apartment and longer term rented/owned housing that is required.

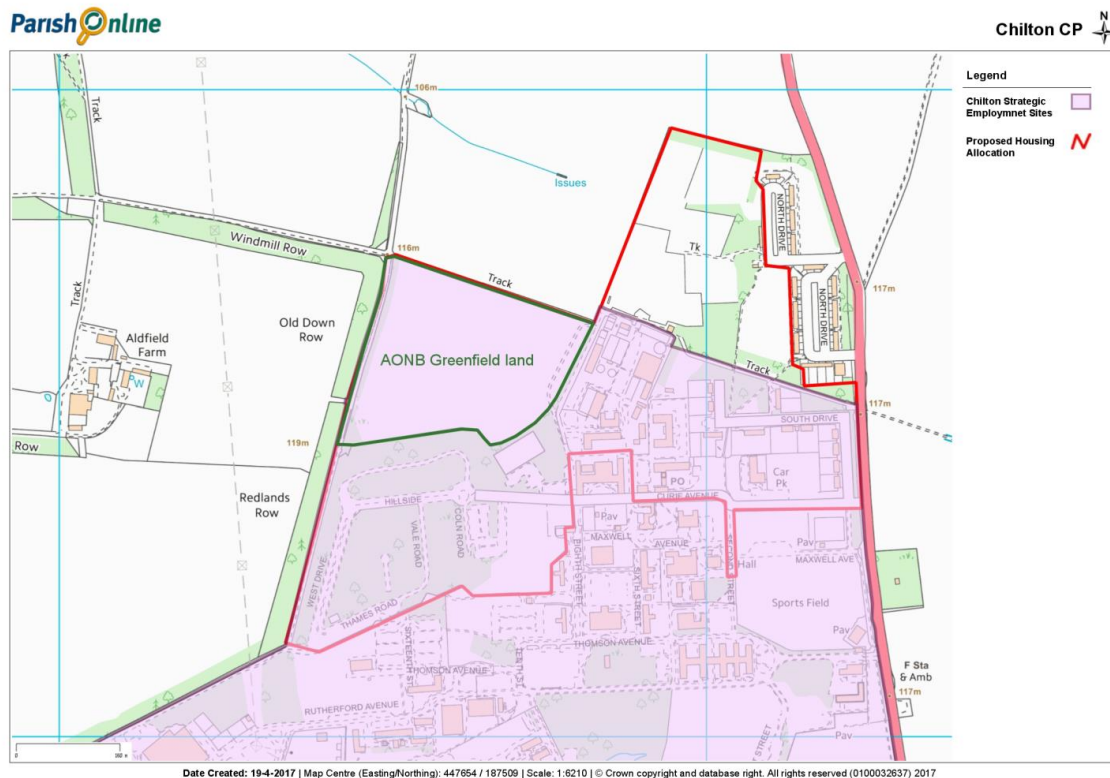
Finally, Core Policy 15b refers to relevant stakeholders, yet does not include the 3 Campus parish councils. Please confirm (and amend the plan accordingly) that Chilton, E. Hendred and Harwell Parish Councils are all relevant stakeholders.

7. Unnecessary inclusion of AONB Greenfield

The over-allocating of ‘dwelling’ numbers requires more land in order to meet space standards, so the proposed site occupies c. 35 ha. A more realistic housing allocation based on the above-described accommodation mix would require much less land.

A smaller land requirement would avoid a problem with the present proposal which envisages the unnecessary inclusion of AONB Greenfield land (see Figure1).

Fig. 1 Part 2 Campus housing allocation showing unnecessary AONB greenfield inclusion



This is the prominent 7.5 ha arable field east of Aldfield Farm. Although technically inside the NW corner of the Campus (part of the original pre-WWII compulsory purchase order) the land in question has been farmed arable for at least 75 years. This is confirmed from aerial imagery and old-edition 1:10k OS maps in the Council’s possession.

That section of the proposed housing allocation area should either be removed from the accommodation site or scheduled for open-space recreation usage in its entirety.

END

Appendix: Verbatim Extracts from Vale Local Plan 2031 Part EIP Inspector’s Report

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.

111. Supported by an overview and a vision of the area in 2031, policy CP15 sets out the spatial strategy for the South East Vale Sub-Area. It details the overall new housing provision to be planned for in the area and identifies the strategic sites, identified through a robust, five stage site selection process, which will contribute towards delivering this provision. In support of policy CP6 the policy also identifies that 208 ha of land will be provided for new business and employment development and safeguards 7 existing strategic employment sites

Housing Allocations in the North Wessex Downs Area of Outstanding Natural Beauty

112. The plan, as submitted, envisages that housing allocation sites 12 and 13, which are located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), would be developed for around 550 and 850 dwellings respectively. This would be 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. The NPPF advises that in considering applications for such development assessment should be made of the need for the development and its impact on the local economy, the scope for developing elsewhere outside the AONB or meeting the need for the development in some other way, and any detrimental effect on the environment, the landscape and recreational opportunities.

113. In determining whether or not these allocations are soundly-based I have therefore considered whether it is likely and reasonable that the exceptional circumstances necessary to permit applications for housing development on the sites would be considered to exist.

114. Whilst it is not specifically referred to in the plan itself, in terms of the need for housing development in the AONB it has been argued that to fully realise the economic growth potential of Harwell Campus, which itself is of national importance, it needs to evolve from a science and innovation park to a world class Campus environment offering a “work-live-play community”. The integration of housing with the employment function at the Campus is contended as being essential to this and reference has been made to a number of locations across the world where such communities exist.

115. I recognise the importance of Harwell Campus to the local, regional and national economy and do not doubt that some existing or potential employees at the Campus would wish to live there. However, there is little, if any, evidence to support the contention that this is essential to the realisation of the employment growth which the plan and the Oxfordshire Strategic Economic Plan (SEP) envisage taking place at Harwell in the period to 2031. Whilst I note that the Oxfordshire Local Enterprise Partnership strongly supports the housing allocations, its SEP of March 2014 makes no reference to the “work-live-play community” of the scale proposed by the plan (ie 1,400 dwellings in total). It does, however, refer to the development of the Research Village at the Campus involving the creation of the “...feeling of a Campus-based university with 5 accommodation blocks (each with up to 40 bedrooms with shared kitchen facilities on each floor and 5 self-contained apartments for those visiting for longer periods)....”

116. The written evidence proposing/supporting the “work-live-play community” approach to the development of the Campus mostly post-dates the publication of my questions for the relevant part of the examination and none of it quantifies, in terms of job creation, the economic importance of either permitting or refusing housing development in the AONB. Moreover, despite requests from me at the hearing for evidence on the point, no details have been provided of any businesses who have indicated that they would only, or even be more likely to, locate at Harwell if it were to be developed as a work-live-play Campus. Evidence in the form of third party ‘validations’ refers to the need for convenient and affordable housing (particularly to rent), although there is nothing to suggest that this could not be appropriately provided for a short distance from the Campus outside the AONB. The validation from a university professor does refer to the value of on-Campus accommodation, although specifies the need for affordable rooms and apartments for several days to carry out experiments or for longer periods for the training of PhD students. This would appear to indicate a need for the Campus-based university-style accommodation referred to in the SEP which is very different from the 1,400 dwellings proposed in the plan as submitted.

117. Other evidence indicates that 25% of those currently employed at Harwell would consider moving to the Campus if dwellings to rent were available there. However, clearly these people have been attracted to work at Harwell notwithstanding the lack of housing at the Campus and I have seen no convincing evidence to indicate that any existing or new employers at Harwell would, in the future, not be equally successful in attracting people to work there as long as there is sufficient, suitable housing within the Science Vale area generally.

118. I therefore conclude that, on the basis of the evidence put before the examination, the need for a “work-live-play community” at Harwell, and thus housing on sites 12 and 13 within the AONB, has not been demonstrated. Moreover, there is no convincing evidence to indicate that refusing such development would have an adverse effect on the local economy. The updated Sustainability Appraisal’s assessment of the modified plan in this respect is therefore appropriate.

119. Turning to alternative sites I recognise that the proposed “work-live-play community” at Harwell could not be delivered by development outside the AONB. However, this matters little given the lack of a demonstrated need for such a form of development. Nonetheless, the 1,400 dwellings are also intended to contribute towards the Science Vale’s element of the district’s objectively-assessed need for housing. There is nothing to suggest that alternative sites for this housing, outside the AONB but within/close to Science Vale, could not be found if necessary. However, I appreciate that housing on sites 12 and 13 could be accommodated without the need for significant highways infrastructure upgrades which might be necessary

if the housing were to be provided for elsewhere outside the AONB. Moreover, notwithstanding the lack of evidence of need for housing of the scale proposed at the Campus, I recognise that, were it be provided, there would potentially be sustainability benefits in terms of shorter journeys to work (which would also be more likely to be made on foot/by cycle) for residents working at the Campus.

120. In terms of the landscape and recreational opportunities I consider that, subject to very careful design and landscaping, housing development on sites 12 and 13 would not be prominent when viewed from the surrounding higher ground, most notably the Ridgeway path to the south. Moreover, it would be seen in the context of the much larger and more prominent existing Harwell Campus development. However, the developments would be very prominent from the roads and footpaths which bound sites 12 and 13. I understand that the footpaths which bound the north and east sides of site 13 are well-used by residents of Harwell and Chilton villages in particular. Whilst landscaping might substantially obscure views of the dwellings themselves it would also all but eliminate the current, attractive wide, open views from these footpaths across agricultural fields to the Downs beyond. Harm would thus be caused to the landscape of this particular part of the AONB and to the recreational opportunities it currently provides.

121. 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. Nonetheless, and given that the Campus will become an increasingly large centre for employment, there would potentially be some highway infrastructure and travel-to-work sustainability benefits in locating housing at sites 12 and 13 as opposed to elsewhere. The NPPF's exceptional circumstances and public interest tests would be ultimately applied as part of the consideration of any planning applications for housing on these sites, having regard to the evidence available at that time. However, balancing my findings in respect of all that I have read, heard and seen at this point in time, 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.

122. An alternative proposal to housing allocation site 13 has been put forward, involving the development for housing within the northern part of the Harwell Campus itself. This 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. 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. 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.

123. **MM5, MM18, MM54 and MM55**, which delete from policy CP15 (and the plan appendices) housing allocation sites 12 and 13, are therefore necessary to the soundness of the plan. However, it is not necessary for the policy to explain why these sites have been deleted: a plan needs to justify the policies and allocations it includes but not those it does not include. Moreover, I am not persuaded that it would be appropriate for the plan to include a criteria-based policy setting out the requirements a housing development in the AONB would need to fulfil to demonstrate exceptional circumstances: to my mind exceptional circumstances are ones which cannot be envisaged by policy requirements.

124. I deal in Issue 8 below with the implications of the deletion of sites 12 and 13 for the sub-area's and district's housing requirements and the supply of housing land.

Conclusion

135. In summary I conclude that, subject to **MM5, MM18, MM19, MM42, MM43, MM49, MM51, MM52 and MM54-58**, which modify the plan to, amongst other things, delete housing allocations in the North Wessex Downs AONB, the plan sets out a soundly-based strategy for the South East Vale Sub-Area.

Main Mod No.	Category	Core Policy No.	Para No.	Page No. of Strike-through Plan	Suggested Modification
MM5	Policy Wording – Table	Core Policy 4	N/A	Local Plan 46	Removal of East Harwell Campus and North-West Harwell Campus allocations from the South East Vale Sub-Area in Core Policy 4 Removal of South of East Hanney allocation from the Abingdon-on-Thames and Oxford Fringe Sub-Area in Core Policy 4. Amend all other references and Figures to be consistent with this modification