

VALE OF WHITE HORSE LOCAL PLAN 2031
(Part 1 Strategic Sites and Policies)
EXAMINATION

Matter 3 – Spatial Strategy and Housing Supply Ring Fence
Hearing on Tuesday 29 September 2015

Statement from the
Keep Harwell Rural Campaign (KHR)

Keep Harwell Rural (KHR) is a residents' group independent of any statutory body. It was formed in 1998 to enable residents to express their views about changes that may affect Harwell, in ways that could augment and complement the views expressed by the Harwell Parish Council. KHR has inputs from a cross-section of villagers concerned about education, traffic and road safety, sustainability, the amenities provided by our nearest town, Didcot, and the preservation of the character of a village with a thousand year history.

KHR has responded to planning documents since 1998 and has taken part in Structure Plan and Local Plan Public Enquiries. KHR has also commented in detail during public consultations on other planning matters. (www.KeepHarwellRural.org)

August 2015

Why Matter 3 matters to Harwell Village

Harwell is a village with over a thousand years of history and for many decades has had a population of about 2,500 and about 1,100 dwellings. It grew significantly in the mid 20th century, principally as a result of being close to what are now recognised as some of the most vibrant and important centres of scientific and business activity in the country, but has remained an attractive rural community.

We recognise that Harwell village has to adapt to meet the challenge of the growth of our nearest town, Didcot. The question is whether this can be done without destroying the very characteristics of the village and its environment that have drawn people, many of them employees of these important centres, to choose to live here. The proposals in the current Vale Local Plan (and indeed the plans of neighbouring South Oxfordshire) threaten that destruction unless changes to the Plan can be made.

Great Western Park is under construction and has already reduced the rural gap between Harwell village and Didcot from 1.25km to 0.5km, with the new UTC representing a rather dominating expression of the 'start of Didcot'. Indeed, over 20% of the houses (and the UTC) will actually be in the parish of Harwell, which extends to the present edge of Didcot.

The Draft VWH Local Plan 2031 initially added a further 2,150 houses west of Great Western Park in Harwell Parish at Valley Park. This was increased by a further 2,000 within Harwell Parish in the submission version. The consequences for the parish and village are profound. 45% of Parish land that is currently farmland or open countryside will be built over. About 80% of the Parish boundary will have buildings on one or both sides, compared with 20% now. Much of the farmland in question is best and most versatile agricultural land. By 2031 the new developments on Harwell's doorstep would amount to about five existing Harwells.

If changes that we have proposed in our representations on the VWH Local Plan are accepted then at least some remnant of a rural gap can be retained to avoid coalescence of Harwell Village with Didcot and other consequences of this enormous change in population could be mitigated and managed. The issues raised under Matter 3 are relevant to whether such mitigation is possible.

General Concerns about the Issues under Matter 3

The division of the Vale of White Horse District into three subdivisions, and beyond that to imposition of a ring fence for the Science Vale area, is both unnecessary and artificial.

First, just the subdivision into three reduces the flexibility of adjusting the housing provision to meet the evolving needs over the next 15 or more years. This is exacerbated by the introduction of a further constraint in the form of ring fencing within Science Vale Oxford.

The purpose of this is obscure when Science Vale Oxford as depicted in Figure 4.3 of the Plan is the same as the area of South East Vale depicted in Figure 5.4 apart from the extreme south east corner around Blewbury – in which there are no strategic housing proposals anyway.

If, as stated in the Plan, a motivation for these subdivisions and the ring fence is proximity of housing to centres of employment, it is artificial and totally unrealistic. It fails to recognise the historic and current pattern of habitation in the area, where, for example, Abingdon is

just as favoured as a choice of habitation for the largely professional people who work at Harwell and Milton Park as is any village within South East Vale. Indeed places such as Steventon and Drayton (outside South East Vale in 'Abingdon and Oxford Fringe') are nearer to Harwell and Milton Park than Wantage and Grove that are within South East Vale.

A daily travel to work pattern for 2012 for Milton Park¹ illustrates this, with origins distributed widely over at least a 20 mile radius that includes Oxford. This might have many reasons, including shortage of housing or conversely not wanting to live next to the workplace, but it illustrates a complex picture that is unlikely to be radically changed by relatively small differences in housing location.

So whilst these sub divisions may have some arithmetical convenience for the planning process they do not recognise the human dynamics of the areas concerned and by so doing impact on some communities much more than others.

They particularly impact adversely on Harwell, since they virtually exclude *even any discussion* of alternative spatial distributions of housing development to those proposed in the Plan, even ones that would maintain overall housing numbers for VWH as a whole and would maintain the objectives of the Plan. This is surely unsound.

The concept of the ring fence is also unclear from a pedantic arithmetical point of view when it comes to factors such as the calculation of a 5 year housing supply. Is the ring fence subject to a separate 5 year housing supply calculation? Does the same question apply to subdivisions of the Vale? We can anticipate a lot of time being wasted on questions such as this as they relate to detailed housing delivery and individual planning applications. They have little relevance to the overall requirements and would be obscure to all but planning professionals and those whose interests are furthered by a particular self-serving tactical argument.

Our answers to the Inspector's questions are therefore as below.

Questions

3.1 Is the proposed distribution of new housing and employment land (policies CP4 and CP6) soundly based? In particular:

(a) Does the proposed distribution of housing set out in policy CP4 appropriately reflect the settlement hierarchy (policy CP3) and the core planning principle of the NPPF (para 17) to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable?

(b) Does the distribution appropriately reflect the role of Oxford in providing for employment and services for the residents of Vale of White Horse?

The housing distribution cannot be considered to be soundly based, not only because the numbers proposed in CP4 have been challenged, but particularly in the context of Question

¹ Fig 6-1 in SQW Report *The Oxfordshire Innovation Engine*, October 2013.

3.1 because the division into three sub areas of VWH is unnecessary, constraining and artificial as explained above.

Under (a), we would question whether the Plan fully reflects the 12 principles set out in para 17 of the NPPF, particularly the first since it limits the degree to which 'local people are empowered to shape their surroundings' and the flexibility to which plans can be 'kept up to date'. Even if the proposed distribution is judged to satisfy these planning principles, the artificial nature of the subdivisions does not ensure that the proposed distribution is the best way of meeting these principles for the whole District.

Under (b), given that some people commute to Oxford from subdivision areas that are assumed in the Plan not to be particularly relevant to the role of Oxford, the answer to this question must be 'not entirely'.

3.3 Is it feasible that a significantly different distribution of housing development from that proposed could be delivered?

Yes, see the points and proposals made in KHR Representation 4 (See Appendix), but only if the constraints of ring fencing and subdivisions are removed.

3.4 Is the "housing supply ring fence" approach of policy CP5 to the delivery of housing in the Science Vale area (a) adequately explained in terms of its practical operation, (b) justified, (c) likely to be effective and (d) in accordance with national policy?

The ring fence approach is not adequately explained (a), nor is it justified (b) and likely to be effective (c), because it is naive and unrealistic to suppose that the areas within the ring fence are the only ones that are relevant to employment in Science Vale. To illustrate this, Steventon and Drayton (outside South East Vale in 'Abingdon and Oxford Fringe' and outside the ring fence) are nearer to Harwell and Milton Park than Wantage and Grove that are within South East Vale and within the ring fence. Conversely, many people living within the ring fence areas do not work within Science Vale, and many future residents who come and live in the new developments will also not work within Science Vale. The whole construct is an artificial convenience to planners, and a blight on local communities that happen to fall within the fence.

With regard to (d) we cannot find any reference to housing supply ring fencing in the NPPF, so the approach of policy CP5 is not covered by national policy.

At the level of the strategic issues that the Inspector has restricted to Stage 1, what we would like to see being concluded from Matter 3 are:

- 1. There is no rigorous logic or realistic rationale behind the areas chosen to be in the ring fence; it also has no justification in national planning policy. Its undesirable effects are exacerbated by the arbitrariness of the three subdivisions of the Vale.*
- 2. The artificial sub-divisions of VWH should therefore be abolished, most particularly the 'housing supply ring fence', but also the separate three subdivisions, which imply a rigidity in housing planning numbers.*

Appendix: Copy of main text of KHR Representation 4

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.

Core Policies 4 and 5 are unsound because they are not sufficiently justified nor will be effective. A separate representation deals with questions about the validity of the SHMA. This representation applies even if the SHMA is judged to be appropriate as a target for the overall housing needs of the Vale of White Horse District. If criticism of the SHMA is upheld and the housing targets are reduced then some of the quantitative elements of this representation can be re-considered.

General grounds for our objections

By dividing the District into three Sub Areas VWH has unnecessarily and unrealistically reduced the flexibility of adjusting the housing provision to meet the evolving needs over the next 15 or more years.

This is exacerbated by the introduction of a further constraint in the form of ring fencing within Science Vale Oxford. The purpose of this is obscure when Science Vale Oxford as depicted in Figure 4.3 is the same as the area of South East Vale depicted in Figure 5.4 apart from the extreme south east corner around Blewbury – in which there are no strategic housing proposals anyway.

Furthermore, if a motivation for these subdivisions is proximity of housing to centres of employment, it fails to recognise the historic and current pattern of habitation in the area, where, for example, Abingdon is just as favoured as a choice of habitation for the largely professional people who work at Harwell and Milton Park as is any village within South East Vale. Indeed places such as Steventon and Drayton (outside South East Vale in 'Abingdon and Oxford Fringe') are nearer to Harwell and Milton Park than Wantage and Grove that are within South East Vale.

A daily travel to work pattern for 2012 for Milton Park² illustrates this, with origins distributed widely over at least a 20 mile radius. This might have many reasons, including shortage of housing or conversely not wanting to live next to the workplace, but it illustrates a complex picture that is unlikely to be radically changed by small differences in housing location.

So whilst these sub divisions may have some arithmetical convenience for the planning process they do not recognise the human dynamics of the areas concerned and by so doing impact on some communities much more than others.

Consequences for Harwell

Harwell village is especially changed by the proposals in Core Policies 5 and 6: 45% of Parish land that is currently farmland or open countryside will be built over. About 80% of the Parish boundary will have buildings on one or both sides, compared with 20% now. Much of the farmland in question is best and most versatile agricultural land. By 2031 the new developments on Harwell's doorstep would amount to about five existing Harwells.

Specifically the increase in housing numbers stemming from the SHMA has (a) added 1,200 more houses to Valley Park (both sections) that already impinges on the rural gap between Harwell and Didcot; (b) caused VWH to add 850 houses at East of Harwell Campus on the

² Fig 6-1 in SQW Report *The Oxfordshire Innovation Engine*, October 2013.

North Wessex AONB; (c) added 550 houses North of Harwell Campus on the North Wessex AONB and (d) added 200 houses West of Harwell. All of these will have an undesirable impact on the countryside areas in question.

Paragraph 116 of the NPPF states that planning permission for major development in the AONB should be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest (paragraph 5.61). In paragraph 5.62 VWH cites the benefits of proximity to the Harwell Campus as the 'exceptional circumstances'. Whilst this may arguably have some validity for (c), which adjoins existing housing, it fails to recognise the open countryside nature of (b), with its amenity value to local residents, and given the habitation patterns of local workforces overestimates the importance of extreme proximity to place of work. (d) is a site with limited access and connectivity to the rest of Harwell Village and its template in Appendix A p.33 does not recognise the extent of improvements to Grove Road that would be needed.

We therefore oppose (b) and (d) and would seek to reduce the total housing figure (a) for Valley Park from 3,350 towards its original figure of 2,150.

Potential Solutions

The options for modifying the Plan to meet these objections are limited, but do exist. Core Policies 4 and 5 are unsound because not only have they divided VWH into sub-areas across which no flexibility is allowed, but also because they have ignored some options for strategic housing allocations. Examples are given below.

In its background documents VWH has considered and rejected the proposal known as 'Oxford Garden City', which would site 12,000 – 15,000 houses between East Hanney and Steventon. It has not considered any options for siting some fraction of this number in that area, and even the SHLAAs for Drayton, Steventon and East Hanney only examined three small areas near Steventon and East Hanney with potential for at most 165 houses.

It is unsound to consider this area for the whole of Oxford Garden City, including its avoidance or mitigation of flood zones, and then by rejecting that option fail to consider any other options for the area. Some of the area between East Hanney and Steventon is safeguarded by Core Policy 14 for a possible Upper Thames Reservoir (see also Appendix F). However, this may not be needed beyond 2019 and also may not preclude the availability of some potential sites. The associated uncertainty could though be taken into account in the Plan by keeping the additional housing of (a), (b) and (d) as reserves for the later part of the Plan period, against the also uncertain achievement of the large forecast growth in employment in Science Vale Oxford.

Another alternative housing site left unexplored in the Plan is the land at Didcot A Power Station site. Core Policy 16 implies some possible use for 'residential' and the land areas would suggest that up to about 20 ha could be available other than the 29 ha reserved for employment uses. This could accommodate up to about 400 houses.

Furthermore, the option of using housing locations around Didcot in SODC in order to reduce the need to develop on the AONB and to limit coalescence of Didcot and Harwell could be considered under the 'duty to cooperate'.

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.

1. Abolish artificial sub-divisions of VWH.
 2. Delete 850 houses at East of Harwell Campus on the North Wessex AONB.
 3. Reduce the scale of Valley Park with North West Valley Park from 3,350 towards the figure of 2,150 that applied before the increase of 1,200 stemming from the SHMA.
 4. Delete 200 houses West of Harwell.
 5. Review alternative sites in VWH and SODC that could accommodate these changes.
 6. If this review cannot find alternative sites, reduce 850 houses at East of Harwell Campus, 1,200 houses at Valley Park (both sections) and 200 houses at West of Harwell to 'reserve' status in the Local Plan, to be built only if the employment numbers on which the SHMA is based are realised in practice after ca. 2025.
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