

North Wessex Downs AONB
Units 3-4 | Denford Manor | Lower Denford | Hungerford | Berkshire RG17 0UN
tel: 01488 685440 | email: info@northwessexdowns.org.uk

by email to planning.policy@whitehorsedc.gov.uk

Planning Policy Team
Vale of White Horse District Council
Milton Park

22 November 2017

Dear Sirs,

**Vale of White Horse Local Plan 2031 Part 2 : Detailed Policies and Additional Sites –
Publication Version**

**Representations by North Wessex Downs AONB on the Publication Version (October 2017)
and related/supporting documents**

(A) Background context and summary

1. We have reviewed the Local Plan 2031 Part 2 (LPP2) Publication Version and related documents which are relevant to AONB objectives and considered these in the light of the response by the North Wessex Downs AONB to the Consultation Draft published in March 2017.
2. We welcome the adjustments to the Consultation Draft of LPP2 which reflect some of our earlier comments and recommendations.
3. We are disappointed that the proposed site allocation at Harwell Campus (Core Policy 15a and 15b) remains part of LPP2. We consider that this policy is **not legally compliant**, (and specifically it is not consistent with national policy and statutory objectives to protect nationally significant landscapes) and that its inclusion **causes the Local Plan Part 2 to be unsound**.
4. We consider that the Sustainability Appraisal of LPP2 remains deficient. It fails to demonstrate that a comprehensive cumulative impact assessment of proposed housing development on the AONB which would arise from the site allocations in the Local Plan 2031 (Parts 1 and 2) in combination with strategic plans for housing development in adjacent local authority areas has been conducted. We consider that this supports our view that LPP2 is not legally compliant and has insufficient evidence to support an overall conclusion on its soundness.
5. We request that LPP2 should be modified to address our concerns.
6. **The AONB wishes to participate in the oral examination of LPP2** in order to be able to advance our case. We consider this is vitally important to discharge our duty to safeguard the objectives of the North Wessex Downs Area of Outstanding Natural Beauty.
7. The key points we raise are:
 - Our substantial concern is that harm will arise to the North Wessex Downs AONB through implementation of the renewed proposal for a major housing development (of 1,000 new



homes) within the AONB at the Harwell Campus. Our detailed considerations are set out in Section (B) below.

- We have previously recommended that the Sustainability Appraisal of LPP2 should be improved to provide a more appropriate assessment of the likely cumulative impacts on the AONB and its setting of housing and associated developments in the Vale of White Horse and neighbouring areas. This has been rejected, with a comment that the cumulative assessment has been conducted. We disagree and continue to request that a wider and more informative assessment of impacts should be undertaken. We maintain that this would inform and contribute to an examination of the soundness of the Plan.

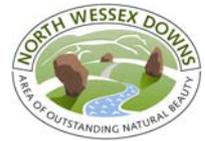
(B) Harwell Campus site allocation (Core Policy 15a and 15b)

8. The AONB **objects to Core Policies 15a and 15b** in the strongest terms. We find that Harwell Campus site allocation proposal for 1,000 homes – which we understand is the largest ever housing development proposal within an Area of Outstanding Natural Beauty – is inappropriate and unjustified. It runs counter to the statutory protection afforded to nationally significant landscapes and to national planning policy aimed to safeguard these assets.
9. Proposed site allocations amounting to 1,400 new homes in Part 1 of the Vale of White Horse Local Plan 2031 (LPP1) adjacent to the Harwell Campus were clearly rejected in 2016 by the Inspector at the conclusion of the Examination (EiP) of the Plan. None of the arguments advanced to support the Harwell Campus site allocation are new; there are no discernible changes in circumstances at Harwell Campus since the EiP of LPP1 in 2015-16. Although the footprint of the proposed site largely differs from the two sites in LPP1, which were removed from the Plan by the Inspector as unsound, the Inspector specifically covered the possibility of broadly the current proposal in his conclusions:

“An alternative proposal to housing allocation site 13 [which was on Harwell Field, to the east of the Campus] 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.” (EiP report para 122)

Housing requirements

10. We contend that the need to allocate land within the AONB for the proposed 1,000 homes remains unjustified. The table in LPP2 Core Policy 15a (LPP2; p. 47) shows the housing completions and site allocations available to meet the assessed housing requirement for the South East Vale Sub-Area. The figures as presented mask the fact that there is an excess of supply over need amounting to 1,212 dwellings over the Plan period of 2011-2031. This surplus includes the proposed Harwell Campus site allocation within the AONB. As the housing development proposed in LPP1 within the AONB was rejected by the Inspector as unsound, we consider that the new proposal for 1,000 homes in the AONB in LPP2 is entirely inappropriate.



11. We recommend that the 'Part 2 Allocations' table (LPP2; p. 48) should be amended to remove the 'Harwell Campus' line, with consequential amendments to the Policy and supporting text and elsewhere as appropriate (e.g. the table in Policy 4a, p. 27). We also note that the housing requirements in Oxfordshire could be reduced in future if the methodology proposed by DCLG in '*Planning for the right homes in the right places*' is adopted. The table on page 47 of LPP2 is clear that housing need in the Vale of White Horse has been updated "... to reflect the residual necessary to meet the agreed quantum of unmet housing need for Oxford to be addressed within the Vale." This residual would reduce if the proposed new DCLG methodology is implemented.
12. The consideration in LPP2 of alternative sites to the Harwell Campus site allocation to provide for 1,000 new dwellings is consequently irrelevant, since the housing requirement for the South East Vale Sub-Area can meet without resorting to the Harwell allocation within the AONB. It is also worth noting that the Inspector for LPP1 considered that "*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*" (Inspector's report on LPP1 EiP, para 119).

Work-live-play community

13. A central feature of the Harwell Campus site allocation in LPP2 is for a 'work-live-play' community. This is set out in Section 4 of the SQW '*Harwell Campus "Exceptional Circumstances" report*' for the District Council (in particular paras 4.1-7) and summarised in the LPP2 paragraph 2.107:

"To achieve its full potential, the campus needs to evolve from a Science and Innovation Park to a world class campus environment offering a work-live-play community. The new work-live-play community will be delivered as an Innovation Village, with a new residential neighbourhood being created as an attractive living environment, designed to provide new homes for both permanent and transient employees working both at the Campus and within Science Vale."

14. The case for integrating housing with employment at Harwell Campus in this way was similarly promoted by the Council at the EiP of LPP1. This was entirely rejected by the Inspector, having reviewed the case in detail and found no merit in it. The arguments are set out in paras 114-118 which are reproduced below:

"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."

15. SQW claim to have "produced more up to date evidence relating to the need for housing at the campus since the Examination of LPP1" (SQW Report, para 2.10). However, we consider that the case is not convincing and fails to demonstrate clearly that any of the Inspector's arguments have been superseded. For example, the SQW report still fails to:
- (i) quantify, in terms of job creation, the economic importance of either permitting or refusing housing development at Harwell Campus;
 - (ii) identify 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 campus¹;
 - (iii) show that affordable housing could not be appropriately provided a short distance from the campus outside the AONB;
 - (iv) provide 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

¹ The Publication Version of the Plan at paragraph 2.109 adds that from a survey by CBRE "it is considered that this community is likely to attract new employers to locate at the Campus" - which is simply an assertion by the consultants based on the views of existing (not prospective) employers. This falls far short of the evidence needed.



there as at present, so long as there is sufficient, suitable housing within the Science Vale area generally.

16. The case for housing development on the Harwell Campus includes making provision for relatively short-term employees (see for example paragraph 4.14 of the SQW report and its report in Box 5 of an interview with Dr Nanda Rodrigues, Chief Operating Officer, MRC Harwell). The Inspector for LPP1 broadly accepted that a modest need of this kind did exist, but argued that *"This would appear to indicate a need for the campus-based university-style accommodation referred to in the SEP² which is very different from the 1,400 dwellings proposed in the plan as submitted"* (LPP1 EIP report para 116).
17. Provision for transient employees working at the Harwell Campus has been made in the Enterprise Zone development granted planning permission in January 2016 (planning application P15/V0575/EZ. Part of this mixed use scheme includes *"accommodation, including serviced and short stay accommodation for staff and visitors"*. The application does not specify the intended scale of accommodation development and the permission granted does not limit the number of units. However, the Council did impose an important condition that *"all serviced accommodation and short stay accommodation hereby permitted shall be limited to visitors and staff only and shall not be occupied continuously by any individual for more than 12 calendar months at any one time."* We would consider this to be a reasonable approach, appropriate for its purpose in supporting the specific needs of the Harwell Campus. The decision removes one of the key arguments for providing substantial extra housing to support Harwell Campus in this LPP2.

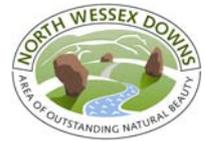
Suitable housing for Harwell Campus staff

18. The principal message on housing needs for Harwell Campus from both the SQW *Harwell Campus "Exceptional Circumstances" report* and LPP2 is not the need for on-site housing so much as for generally improved access to housing suitable for staff to buy or to rent in the vicinity of the Campus. There are repeated references to a deficiency of suitable housing affordable to Campus staff, and also that house building is not necessarily targeted at this group of occupants. With the major growth of a cross-section of dwelling types around Didcot, so close to Harwell Campus, promoted through the Didcot Garden Town plan, it seems reasonable to conclude that suitable housing in the vicinity of the Campus will become available without the need to build 1,000 new homes within the AONB.
19. SQW reports that the Harwell Campus Partnership has put forward its own indicative mix of housing that it proposes on the Campus (SQW report para 4.24). This shows that 65% of the stock would be private, for market sale or rent; 35% affordable, i.e. sub-market to some degree. This is much the same as the proportions typically provided in developments in the area. Consequently the dwelling mix on Harwell Campus would be no different from commercial development anywhere in the area.

Employment land for Harwell Campus

20. Harwell Campus covers 287 hectares. Within this there are 93ha of development land available at the Harwell Enterprise Zone and a further 35ha of development land outside the Enterprise Zone, but still within the Campus. The SQW Report notes (para 7.5) that 21ha

² The Oxfordshire Local Enterprise Partnership's Strategic Economic Plan stated of Harwell *"The Research Village will recreate 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) situated around a central amenities area with a café with free wifi, configurable shared space for social events, bar and post office. This amenity centre will have room to expand and grow with the Campus."*



within the EZ are not developable for a variety of reasons. The proposed Harwell Campus site allocation would cover about 37ha (of which 29.4ha would be within the Enterprise Zone), substantially reducing the remaining space for economic development on the Campus. The Enterprise Zone already includes undeveloped land which should, from the perspective of safeguarding the AONB. However, the *Harwell Campus Update* of October 2017 shows that significant remaining parts of the Campus will soon be developed for research and commercial purposes, including:

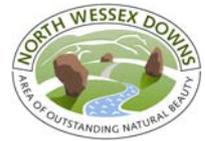
- a large area of land known as The Quad between the Fermi and Thompson entrances, extending well back into the site, plus further land south of Becquerel Avenue, is already under development within the Enterprise Zone;
- 4 million ft² of other development is in the pipeline; and

Consequently, in ten years from now the only significant undeveloped areas remaining will be on the south and west sides.

21. The implication of the development proposals for the Campus is that almost all the land the Campus wishes to see developed will have been used up in about a decade. Under these circumstances the use of 37 hectares for housing development would be a significant loss of land identified for employment, whether as Enterprise Zone or under Saved Policy E7 from the Local Plan 2011. The Inspector at the LPP1 EiP last year noted that the option of housing development within the Campus itself (as now proposed) “...*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*” (LPP1 EiP report, paragraph 122).
22. We therefore strongly oppose the development of housing within Harwell Campus, not only as a matter of principle – as there are no exceptional circumstances to justify this development in the AONB – but also because it is highly likely to result in greater pressure for the release of other land within the AONB in the short to medium term for further development.

Impact of the proposed housing allocation on the AONB landscape

23. The principal harm to the AONB from the proposed Harwell Campus site allocation would arise from development of the agricultural land in the north-west of the site, immediately south of the Icknield Way. The *Landscape and Visual Appraisal* prepared by HAD correctly states of this parcel “*consists of a large arable field, contained to the south and west by tree belts, but open to the Icknield Way, to the north*” (HAD report, para 3.1.2). The character of this land is entirely different from the Campus and it forms a key part of the wider Campus setting. It cannot be described as a transition as the landscape abruptly changes. The field is representative of the wider landscape character. Its northern boundary is open; there is a shelterbelt on its western boundary; the southern boundary is a woodland belt bordering the Campus; and the eastern boundary borders the Magnox decontamination area, with limited sporadic tree cover. The field is of high landscape sensitivity, due to its location within the AONB and bordering the Icknield Way strategic right of way. Development of the field would result in a substantial and irreversible change to the landscape, resulting in an impact that would in LVIA terms be of Major Adverse Significance.
24. Housing development proposed on the north-west arable field could not be mitigated effectively. There would be a complete change to the character of the land affected, and planting trees adjacent to the Icknield Way would not remedy this. The HDA *Landscape and Visual Appraisal* states that the character of this area of land has a ‘High’ sensitivity to change (HAD report para 3.1.11) and would experience a ‘High’ magnitude of change (para 5.2.3). People (visual receptors) will always experience a significant change as they move

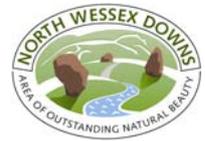


along the Icknield Way or view the site from the north. The character and perception of the area will change irreversibly and cannot be mitigated.

25. Our assessment of the landscape and visual significance of developing each of the four distinct areas within the proposed Harwell Campus site allocation is as follows:

Site	Landscape significance	Visual significance	Overall significance
South Drive	Negligible	Minor Adverse	Minor Adverse to None
West of North Drive	Moderate Adverse	Minor/Moderate Adverse	Moderate to Moderate/Minor
Employment allocation and decontamination area south of Icknield Way	Minor Adverse	Minor Adverse	Minor Adverse
Arable field	Major Adverse	Major Adverse	Minor Adverse

26. In contrast, the HDA report instead assesses the long term landscape effects on the north-west arable field as Moderate Adverse and not Significant (HAD report para 5.2.4). We disagree with this assessment. We accept that the visual impacts will derive mainly from the views in the vicinity of the site allocation and the point that *“there would be no significant adverse effects on the enjoyment of The Ridgway National Trail”* (HDA para 6.1). The field would undergo a total and irreversible change from its present character. The housing would be perceived as an isolated urban development in the AONB. The site is part of the typical rural character of the Hendred Plain in the AONB, not typical of the existing Campus. In contrast to the claim by HDA (para 5.3.2) that from the Icknield Way *“there would not be a significant departure from existing views of the campus from this stretch of the path”*, the proposed tree screen, if successful, would eliminate entirely views of typical AONB landscape in the southern half the compass. Only views to the north would remain. We reject entirely the HDA suggestion that the residual visual effects here after mitigation would be ‘minor beneficial’.
27. Assessment of landscape and visual effects of the proposal is hampered by the lack of clarity over exactly what kind of housing development might be proposed across the allocation area. The relative impact of the use of the land for employment purposes rather than housing purposes can be difficult to assess. The HDA report suggests that housing development on parts of the area could be four storeys high: the relative effect of such properties 15m high would depend on how low-rise or high-rise the alternative employment structures might be. It is not clear to what extent the Heights Parameters Plan (Figure 21 of the Harwell Framework draft MasterPlan, January 2016) remains the current intention. We do not accept that housing development across the allocation site would necessarily have less impact on the AONB than employment development.
28. In addition to the landscape and visual impacts of housing development, consideration also needs to be given to the consequential effects of physical development on the AONB. These include:
- Lighting. The housing development is likely to be lit by street lighting and by private domestic and security lighting, recognising that urban development is occupied 24/7 unlike employment development. The AONB is sensitive to light pollution, and the proposed housing could be expected to diminish the experience of the nationally protected landscape between sunset and sunrise by giving it a more urban character.
 - New village. The stated intention of LPP2 is to create a ‘larger village’ in the District (Core Policy 15a). This would transform Harwell Campus from essentially an employment site to



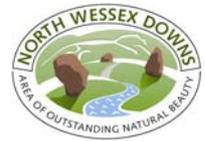
a general urban area. There would be serious loss of scope for controlling consequential impacts of that transformation on landscape character and landscape quality as the commercial and domestic developments interacted. Permitted development rights associated with residential housing would limit opportunities to control the extension of housing development.

- Noise. 1,000 houses would generate a substantial amount of noise, particularly from motor vehicles – by residents, by service vehicles and other sources. The noise impact will be most pronounced during daylight hours, and beyond in winter, again altering the perception of the character of the AONB.

The effects of employment development in each of these respects may well be less than the effects of housing, depending on the nature of the employment development intended.

'Exceptional circumstances' for allocating 1,000 houses to Harwell Campus

29. The Publication Version of the LPP2 claims (para 2.113) that there are 'exceptional circumstances' in terms of NPPF paragraph 116 to justify development of 1,000 new homes at Harwell Campus within the North Wessex Downs AONB. The reasons are summarised in paragraph 2.116. The AONB disagrees strongly with the assertions made. To some extent our comments above have covered the issues raised by the Council, but the following paragraphs summarise our main points.
30. LPP2 does not fully respond to paragraph 116 of the NPPF which deals with major development proposals in AONBs. It has omitted one of the defined criteria for reviewing the proposed policy: the need for an assessment of "meeting the need for it in some other way". This was also omitted from the report by SQW on which the Council relies (*Harwell Campus "Exceptional Circumstances" report*, October 2017).
31. The 'public interest' test, which is distinct in NPPF paragraph 116 from 'exceptional circumstances', is treated in LPP2 as if it was confined to economic interests. This is an error. The public interest also involves wider dimensions of the environmental and social aspects of sustainable development, on which we have commented briefly above. We do not consider that the 'public interest' test is satisfied, noting that the whole of Harwell Campus is within the designated North Wessex Downs AONB. This is because:
- (a) there is no justification for the proposed development (housing requirements in the area can be met without any of the 1,000 houses);
 - (b) the proposal would (in part) cause significant direct adverse effects on the special landscape qualities of this nationally protected landscape; and
 - (c) the proposal (as a whole) would risk reducing employment land on the Campus and consequently increase the potential demand in future for additional AONB land adjacent to the Campus being proposed for development.
32. While Harwell Campus is a national and international asset, has leading-edge scientific facilities, and has been the recipient of substantial public funding investment, any proposals for damaging major development in the AONB must still satisfy the same exacting tests which would permit an exception to specific intention of legislation and policy to protect nationally important landscapes. Neither the 'public interest' test nor the 'exceptional circumstances' test can be claimed as satisfied simply because of the significance of the location.
33. Regarding the claimed need for the development, there is simply no evidence to support the claim, only assertion. LPP2 states that "*the underlying scientific asset base is world class, but without sufficient numbers of suitably qualified people who are willing and able to commit to working at Harwell, its impact will be stymied*". This may be a general challenge to the



Campus, but it provides no justification for the proposed housing allocation. Nor does the following assertion in LPP2: the institutions said to be supporting the allocation have a narrow economic focus and, like the Council, appear to be encouraging a 'live-work-play' community at the Campus. This clearly contradicts the evidence and logic which resulted in the EiP Inspector of LPP1 rejecting the similar proposal just one year ago.

34. The Plan claims that "*not supporting residential development at Harwell Campus would be detrimental to the local economy*" but provides no evidence for this.
35. The cost of, and scope for, developing elsewhere outside the designated area is not a valid consideration since provision is made within Local Plan for the housing development proposed, sufficient for the defined housing requirement for the South East Vale Sub-area. The claim is also made that the 'live-work-play' community proposed could only realistically be provided on-site. Even if such a model was desirable (having been rejected by the LPP1 EiP Inspector), the LPP2 fails to present a credible case that 1,000 houses on the Campus are necessary to sustain it. We have seen nothing in the material provided to respond to the Inspector's finding that he had "*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.*" LPP2 has clearly failed to consider "*meeting the need for it in some other way*" as the NPPF paragraph 116 requires.
36. Considering detrimental effects on the environment, the principal harm to the AONB would be the development of the arable field on the north-west side of the proposed allocation site. There would also be indirect consequences – the entirely foreseeable future case for the expansion of the Campus onto open AONB land – if housing development proceeded now on the employment land at the Campus. Ignoring this risk, as the Plan does, is irresponsible: this is the kind of issue that 'planning' is supposed to address. The supporting document by SQW *Harwell Campus "Exceptional Circumstances" report* notes too that 21ha within the EZ are not developable for a variety of reasons (paragraph 7.5) and we see no reason why a restraint on the north-west arable field for AONB reasons should not be added to that. In short, the amount of available land in the Enterprise Zone is not as great as it might at first look, and this should not be squandered.
37. The final point in LPP2 para 2.116, that "*Detailed work is ongoing to develop a comprehensive development framework for the site, which includes, for example, the need to achieve a high quality landscaping scheme*" is irrelevant to the claim of 'exceptional circumstances'. Such detail cannot be considered to address the principle of whether or not the Harwell Campus site allocation should be made.

Ian Hepburn
Planning Advisor