
Land at Harwell Campus

Representations to Proposed Main Modifications to Vale of White Horse Local
Plan 2031 Part 2: Detailed Policies and Additional Sites

On Behalf of Ptarmigan Land

March 2019

Representations to Proposed Main Modifications to
Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites

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1.0 INTRODUCTION

- 1.1 The following representations are made and duly submitted on behalf of Ptarmigan Land in relation to the proposed Main Modifications to the Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites.
- 1.2 The Inspector presiding over the Examination into the above Local Plan has made initial recommendations in his letter dated 19 December 2018, recommending various changes to the plan, including that the proposed allocation at Harwell campus be deleted, in order to make the plan sound. The VoWH Council has agreed with the Inspector's recommendations and published the Proposed Main Modifications, which are subject to this consultation.
- 1.3 We have significant concerns over the Council's changed approach to Harwell Campus and Science Vale, which are outlined below.

2.0 INSPECTOR'S REASONING

- 2.1 The Inspector's letter dated 19 December 2019 provides little explanation as to the reasoning behind his concluding recommendations. As such, it is very difficult to address his concerns.
- 2.2 The reference to there not being sufficient evidence to support the Harwell Campus proposed allocation, however, is not considered to be justified. Significant evidence has been placed before the Examination on the need for a mixed use live-work-play development at Harwell campus. This includes evidence prepared on behalf of the Campus, the Council and Ptarmigan land – each of which relied upon solid research and evidence – and each reaching the same conclusions.
- 2.3 The fact that this evidence has not been referred to indicates that the Inspector does not appear to have adequately considered the research put before him. Such research is beyond doubt in demonstrating that the requirements of the Campus and its future success relies upon additional development in the form of new facilities, homes (for temporary and more permanent / established residents), employment space and supporting facilities through a live-work-play environment. The same message is explicitly repeated by existing occupiers and workers at Harwell Campus.
- 2.4 In addition, evidence was put before the Examination demonstrating that the landscape impacts of such development would not result in any overriding harm to the AONB.
- 2.5 The Inspector, whilst recognising the need to consider whether the requirements of the NPPF for development in the AONB have a reasonable prospect of being achieved (in the determination of any planning applications), does not appear to have adequately considered a number of matters as outlined in the following sections.
- 2.6 In light of the above, it is considered that the Council properly consider the tests for development within the AONB, as set out in paragraphs 115 and 116 of the NPPF (2012).

3.0 PRINCIPLE OF DEVELOPMENT

- 3.1 Development at Harwell Campus has been deemed acceptable for many years, dating back to the 1990s when the Government entered into a partnership venture for the establishment of Harwell Campus as it is today. Since then, significant development has taken place amounting to billions of public sector investment and tens of thousands of square metres of development.
- 3.2 Whilst this may be primarily employment development, the tests in the NPPF (2012) do not distinguish between employment and residential development. Furthermore, extensive supporting facilities have also been provided. All of this development has been deemed acceptable with the Campus having been located within the AONB and therefore the requirements of the NPPF (and its predecessors in Government policy) having been passed.
- 3.3 It therefore stands neither logic nor reason that such levels of employment and supporting facilities have been deemed acceptable for decades, recognising such uses are needed in this location, indeed without the weight of evidence now supporting the proposed allocation for mixed use (live-work-play) development; yet the much needed additional development proposed within the draft Local Plan Part 2 is deemed to not be acceptable.
- 3.4 It is obvious that Harwell Campus cannot be moved elsewhere and given its international status and importance, there will be an inevitable pressure for development beyond what currently exists, be that for employment, residential, or supporting facilities – all of which seeking to continue and maintain its success for decades to come.
- 3.5 Therefore, in a plan-led planning system, it must be for the Local Plan to pave the way for such growth, improvement and continued success.
- 3.6 To compound the argument further, Harwell Campus benefits from Enterprise Zone status. As one of only a relative limited number of Enterprise Zones in the UK, where the Government actively supports employment (and indeed ancillary) development, such a status was granted in full acknowledgement of the AONB within which it sits – the AONB having been established many years prior. Therefore, it is entirely right in the Governments opinion that employment (and ancillary) development should continue to be created at Harwell Campus.

- 3.7 Therefore, with the principle of development having been so firmly placed at Harwell Campus for so many years, both at the national and local level, it is anomalous to now determine that the Development Plan should not support this expectation.
- 3.8 It may well be argued that such development and policy framework does not necessarily determine that large scale residential development can take place in this location, but that, in our opinion, would be placing an additional test into the NPPF that simply does not exist and it would be erroneous to do so. Paragraphs 115 & 116 of the NPPF make no distinction between types, uses or forms of development, simply that certain tests need to be applied when determining planning applications for major development within the AONB. Indeed, none of those tests offer any distinction between “uses” – rather that planning permission should be refused for major developments in the AONB except in exceptional circumstances and where it can be demonstrated they are in the public interest, considering:
- 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; and
 - any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 3.9 Therefore, it stands to reason that if large scale employment development in the form that has been granted planning permission for Big Science over recent years (including that of some scale, mass, form and height) is able to pass the tests outlined within the NPPF, then in principle, any use can potentially also pass such tests, including residential uses.
- 3.10 Residential and other uses that are needed to support the continued sustainable growth and success of Harwell Campus can only be given the same ability to pass the tests as employment uses, which have been granted over many years in abundance. Furthermore, in applying the NPPF tests, if there has been a proven and demonstrable need for employment development for both the national and local economic benefit, with no scope or ability to provide such employment elsewhere, with consideration given to its effect on the environment (including landscape) for the scale and quantum of development that has occurred over recent decades at Harwell Campus, then there is no reason why, in principle, residential uses with a similar demonstrable need cannot be located at the same campus. As noted above, such evidence of need has been demonstrated through the evidence before this Examination.

3.11 Therefore, in the interests of consistency of decision-making through the application of planning policy, it is incorrect to disallow certain uses from being granted the same opportunity to pass the NPPF tests for development in the AONB. If one use is deemed to have the reasonable prospect of passing the tests, then the same should apply to any use, including residential.

4.0 IMPLICATIONS OF THE CURRENT APPROACH

- 4.1 The proposed deletion of the allocation at Harwell Campus through the proposed Main Modifications to the Local Plan 2031 Part 2 has significant implications which need to be fully understood.
- 4.2 It is not merely the implications of a proposed strategy which need to be fully considered, but also the implications of alternative strategies, in this regard be that a “do nothing” scenario which would arise from the deletion of the proposed allocation at Harwell Campus. Indeed, it appears to be assumed by the Inspector that the deletion of the proposed allocation effectively avoids a potential impact or problem.
- 4.3 Notwithstanding the extent of evidence before the Examination which demonstrates the need for the development proposed through the allocation in the draft Local Plan Part 2, it is erroneous to assume that doing nothing is an entirely better outcome. Indeed, it could be that the implications of removing the allocation are far greater than the implications of maintaining the allocation. Such implications could include the following matters, each of which must be fully tested through a Sustainability Appraisal:
- Housing Need – type & quantum*
- 4.4 It is not entirely clear how the housing need (relating to both quantum of housing and the particular needs of the campus as set out in the evidence before the Examination) is being re-provided elsewhere. It would appear (draft Policy 4a refers) that housing completions, allocations and commitments elsewhere may have increased resulting in an apparent reduced need for homes to be allocated in the Part 2 Local Plan.
- 4.5 However, that does not negate the need to provide more homes given the particular circumstances at Harwell Campus. In real terms, whilst the calculations of housing supply may add up in the Local Plan, if adopted on that basis, where would those people needing to live and work in close proximity or at Harwell Campus live? It is clear that there is no further opportunity to both live and work at Harwell Campus beyond the very limited level of housing that already exists.
- 4.6 If these scientists, secondees, placements and researchers were required to live at the next nearest available homes, given the scale of existing and future jobs projected and anticipated at Harwell (5,500 existing and a further 9000 projected) will these be the right form, provided at the right time and provide for the right living environments (NPPF paragraphs 17,21 and 50 refer).

- 4.7 The next nearest homes available are likely to be at Didcot, Wantage or Harwell village. These developments are delivering predominantly generic family housing through largely standard house types, which are largely for sale or provided as affordable housing through Registered Providers / sub-market sale. Whilst there is very much an accepted market for this form of housing, there are significant questions as to whether this is the form and tenure of housing needed for the workers and employees at Harwell Campus. The evidence before the Examination would suggest (to a large degree) it is not. For example, a scientist on placement from overseas / elsewhere is likely to need a very different form of home, as evidenced by the survey responses and evidence submitted to the Examination.
- 4.8 Further afield, there may be homes that are more suitable and attractive to the existing/projected workers at Harwell Campus, but they are some distance away and not well connected to Harwell Campus.
- 4.9 It is also worth noting the quantum of housing being proposed for the CaMKoX corridor, which includes Vale of White Horse and indeed Harwell Campus, with its associated infrastructure delivery. Such levels of housing are seen to offer exponential levels of growth as part of a wider economic strategy around the science and knowledge economies. Therefore, the future of this area is likely to be subject to significant change and increased levels of development. Particular care should therefore be given to ensuring levels of development in the short term are not limited, making it far more difficult to address in the future.

Unsustainable Travel Patterns

- 4.10 The scale of the existing and future employment at Harwell Campus is undisputed, making it one of the largest employment locations in the district, if not the county / sub-region. All of this evidence is before the Examination already.
- 4.11 If the allocation at Harwell Campus is removed, employees will need to live elsewhere, which if the type of accommodation needed is fully understood, could be some distance away. This will inevitably lead to an increase in unsustainable travel patterns which could be impossible to address. The very fact that employees are/would be scattered over a much wider area would make it impossible to provide sustainable means of travel (e.g. bus links) feasible. This would mean that employees and workers would be forced to travel by car, utilising roads that are already at or over capacity.

- 4.12 For those working at Harwell Campus who do not have access to a car (by virtue of lifestyle choice, cost, or the temporary nature of their placement at Harwell Campus), it would inevitable be a deciding factor in not coming to Harwell Campus and in such a competitive environment, choosing to operate elsewhere instead.

Infrastructure Delivery

- 4.13 The Council will be acutely aware of the infrastructure delivery that depends upon the development and success at Harwell Campus. All of this sought to assist the further success of the campus, its attractiveness to new occupiers and its improved sustainability, whilst also offering wider benefits, without which the infrastructure delivery will need to be funded from alternative means, if possible, or not provided at all.

Undermining Success

- 4.14 The proposed allocation at Harwell Campus sought to maximise its potential economic impact and success, without which, the benefits will not arise. Whilst the Campus will no doubt continue for years to come, as other competing Science & Innovation campuses grow, flourish and provide for their future in a more comprehensive manner, Harwell Campus is likely to fall further behind as it stagnates from being unable to provide sufficiently for its longer term future. With more attractive environments with greater levels of supporting infrastructure, investors, occupiers, scientists and researchers will inevitably chose such locations, leaving Harwell Campus as an increasingly less attractive and competitive place.
- 4.15 This is clearly not the outcome the Government would wish for having invested billions of pounds into the campus, being a partner in the campus and having granted it Enterprise Zone status.
- 4.16 Furthermore, the premise of the allocation in the draft Local Plan Part 2 was for an Innovation Village (live-work-play) environment, for which evidence is before the Examination. Whilst other locations around the globe are planning to embrace this concept so as to create and maximise the innovation ecosystem, Harwell will be unable to provide such an environment from the campus and wider Science Vale economy can thrive.
- 4.17 We consider that there is sufficient evidence to demonstrate the need for the allocation to remain. However, if there were considered to be deficiencies in the evidence base, these need to be identified and addressed as opposed to removing the draft allocation.

- 4.18 Once such deficiencies are identified and following a robust sustainability appraisal of the available options for Harwell Campus, then additional work could be undertaken to address any missing evidence, with such evidence being reconsidered through a focused session of the Examination.

5.0 RELATIONSHIP TO WIDER STRATEGIES

- 5.1 As indicated above, Harwell Campus is a core element, arguably the anchor or cornerstone, of Science Vale, for which an economic strategy exists within the Council and across the county to support the growth, commercialisation and clustering of science in the area, for the benefit of the local, regional and national economy.
- 5.2 As also identified above, Science Vale (and indeed Harwell Campus) is part of the wider CaMKoX arc, for which a national economic strategy exists, and plans are being brought forward at this very point in time to deliver the strategy. This includes the Oxfordshire 2050 JSSP which is currently out for consultation and is due to be adopted within a very short space of time (it is understood that the JSSP has to be adopted by 31 March 2021).
- 5.3 Given the scale, prominence, importance and location of Harwell Campus; and the focus and promise of the CaMKoX Arc being upon science, innovation and linking knowledge economies, it is highly probably that Harwell Campus will constitute a key element of the wider strategy.
- 5.4 It is therefore imperative that any decisions on this Local Plan Part 2, which looks to 2031, does not directly or inadvertently cut across an emerging and important economic, housing and infrastructure strategy for the wider area for the period up to 2050. Indeed, to do so would undermine its intentions, aspirations and would have significant implications for the Science Vale and beyond.
- 5.5 It is therefore important to provide a cohesive, joined up and future-facing plan for Harwell Campus so as to ensure and protect its future in these wider strategies.
- 5.6 It is important to ensure any vision and development strategy is set in the wider context of the CaMKoX corridor, recognising its purpose, strategy and infrastructure proposals, not least the rail and expressway corridors. The primary purpose of exponential and added economic growth is to leverage such a powerhouse of the national economy, connecting people and places, university research and high-tech / science hubs - Oxfordshire is but one part of this wider strategy which needs to be factored into the thought process.

- 5.7 The relatively recent Inspector's Interim Findings on the Vale of Aylesbury Local Plan 2013-2033 (29 August 2018) recognised this particular issue and serves as a reminder of the responsibilities of local planning authorities to look outside their immediate area and take full account of known, predictable issues that could affect their development needs, in order for them to be able to properly and positively plan for them. Paragraph 6 states:

"Predictable events should be planned for. Both Heathrow expansion and the Oxford - Cambridge expressway are predictable, known, events. Only the route of the latter is not yet fixed. To be sound, VALP should make contingency plans to accommodate them, not simply abandon its function to a future review of uncertain timescale."

6.0 CONCLUSIONS AND RECOMMENDATIONS

- 6.1 In light of the above, it is considered that the Inspector has not sufficiently considered the weight of evidence presented to the Examination on the need for a mixed use live-work-play form of development so as to create an Innovation Village.
- 6.2 In agreeing with the Inspector's recommendations, the Council would be adopting an inconsistent approach to the planning and decision-making of Harwell Campus. The principle of development has existed at Harwell Campus for many years, with it being subject to significant public and private sector investment, a public sector partnership for its operation and expansion and importantly as a focus for economic growth and development through Local Plan Part 1 and its longstanding designation as an Enterprise Zone – the highest tier of economic development only granted by Government to those areas worthy of such focus.
- 6.3 Importantly, the NPPF does not distinguish between types of development when considering the tests for major development in the AONB. Therefore, the Council need to avoid being inconsistent with its Local Plan policy whereby one type of use is favoured over another, as this would be placing an additional test into the NPPF that does not exist. Rather, the Council must be open to all forms of development that would support sustainable development at Harwell campus.
- 6.4 Furthermore, the Council must avoid directly or inadvertently cutting across wider strategies currently being prepared, which include the Oxfordshire 2050 JSSP and strategy for the CaMKoX arc, both of which are highly likely to recognise the importance of Harwell Campus to Science Vale and the knowledge economy.
- 6.5 Whilst it may appear to be a simpler solution to simply delete the allocation at Harwell Campus given concerns over the extent of evidence before the Examination, the implications of so doing need to be fully understood and tested against the available options through the Sustainability Appraisal.
- 6.6 There is clearly a need to properly plan for the future of Harwell Campus in a positive manner for the plan period and beyond – a failure to do this will only result in an uncertain future for the campus, lost opportunity and poor planning. Simply deleting the draft allocation fails to properly plan for the future of the Campus and is very likely to result in significant and adverse impacts that need to be fully understood and tested for both positive and negative impacts through the Sustainability Appraisal against other options available before a decision is made.

- 6.7 We consider that there is sufficient evidence to demonstrate the need for the allocation to remain. However, if there were considered to be deficiencies in the evidence base, these need to be identified and addressed as opposed to removing the draft allocation. Once such deficiencies are identified and following a robust sustainability appraisal of the available options for Harwell Campus, then additional work could be undertaken to address any missing evidence, with such evidence being reconsidered through a focused session of the Examination.
- 6.8 If such an approach was deemed unacceptable for any reason, then in order to avoid cutting across the emerging broader strategies for the JSSP and CaMkoX, the decision for Harwell Campus' future should be left open (and certainly not pre-determined) until the outcome of the wider strategies is fully confirmed. In this regard, a suitably worded policy for Harwell Campus within the Local Plan Part 2 must be provided, combined with the requirement for a partial or full review of the Local Plan that should be undertaken, identifying a timetable for such a review within the Local Plan.