

MATTER 7 – HARWELL CAMPUS

Response on behalf of

Barberry East Hendred Ltd. – 1145333

MATTER 7

Introduction

1. Harris Lamb Property Consultancy (HLPC) are instructed by Barberry East Hendred Ltd. (BEH) to prepare a response to the Inspector's issues and questions in relation to Matter 7. BEH are promoting land to the east of High Street, East Hendred as a proposed housing site to accommodate up to 150 dwellings either as an alternative allocation to those currently included in the Plan or as an additional allocation should further sites be required. Our comments to Matter 7 should be read in this context. We set out our detailed responses to the Inspector's questions below.

Questions

- 7.1) *Is the proposal in the LPP2 to allocate a site for 1,000 dwellings for an Innovation Village at Harwell Campus consistent with the strategy of the LPP1 for the district as a whole and the South East Vale Sub Area?***
2. The overarching Spatial Strategy set out in the Local Plan Part 1 seeks to direct 75% of planned strategic housing growth and 70% of new job creation to the South East Vale Sub Area (SEVSA). In this context, identifying an allocation for 1,000 dwellings in close proximity to a large established employment area would seem to accord with the Spatial Strategy for development.
3. However, Core Policy 3 of the Part 1 Plan identifies a settlement hierarchy, to help guide new housing and employment development within the District. Market Towns are to be the main focus for new development, followed by Local Service Centres, then Larger Villages and finally, Smaller Villages. Market Towns are considered to be the most sustainable locations to accommodate new development due to the range and extent of existing shops, services, facilities and infrastructure present. Local Service Centres are the next most sustainable, whilst Larger Villages are considered to serve a more local function meeting local needs of those in, and around, the settlement.
4. Core Policy 4 of the Part 1 Plan goes on to identify strategic allocations, with the larger strategic allocations being located in and around the Market Towns, with more moderate allocations in the Local Service Centres and Larger Villages. Harwell Campus is classed as a Larger Village in the settlement hierarchy as it has the facilities and services equivalent to a Larger Village.
5. Harwell Campus is proposed to accommodate an allocation of 1,000 dwellings. No other Larger Village in the District is proposed to accommodate such a large allocation of housing and, therefore, we consider this approach is inconsistent with the Council's settlement hierarchy approach and Spatial Strategy, which seeks to focus major new development in the Market Towns and Local Service Centres. Furthermore, whilst Harwell Campus currently has existing

facilities akin to those in a Larger Village, adding a 1,000 dwellings will place significant additional pressures on these services. In order to cope with the additional demand, capacity will need to be increased and further services provided to cope. We do not consider that this is a sustainable approach when the Council could adopt a dispersal strategy and distribute a proportion of these 1,000 dwellings to existing settlements that already have existing facilities and services. Furthermore, a proportionate amount of development directed to selected settlements would mean that existing services could still cope, and even be sustained by moderate new development in these settlements. East Hendred, as a Larger Village located in close proximity to Harwell Campus is one such settlement that we consider would be suitable to accommodate a moderate amount of new housing development.

7.2) *Given the exceptional circumstances and national interest tests in the NPPF for major development in the AONB, is the proposal for an Innovation Village justified by proportionate evidence in principle?*

6. In terms of whether an Innovation Village at Harwell Campus is justified, we refer the Inspector to the Local Plan Part 1 Inspector's Report at paragraphs 111 – 123 (extract attached at **Appendix 1**). The Part 1 Plan proposed the inclusion of two housing allocations at Harwell Campus. However, the Local Plan Inspector was not convinced of the need for such a type of development in this location, noting that insufficient evidence had been provided to justify such a proposal. Accordingly, the draft allocations were recommended for deletion from the Part 1 Plan.
7. In light of the lack of evidence supporting the proposed allocations at Harwell Campus in the Part 1 Plan, the Council have produced a report entitled "Harwell Campus Exceptional Circumstances Report". The report appears to have been produced to respond to the previous Inspector's criticism of the proposed allocations and to retrospectively justify development in the AONB.
8. We set out in our representations why we did not agree with the approach or the conclusions reached by the Council in the Exceptional Circumstances Report and remain of the view that there is no justification for a single development of 1,000 dwellings in the AONB.
9. Notwithstanding this, we do not consider that no allocations should be made in the AONB. The Council, by proposing an allocation in the AONB acknowledge that there is a need to allocate land for development in the AONB. In doing so, we contend that smaller, more dispersed individual sites within the AONB would still achieve the same outcome in terms of the number of dwellings allocated, but at the same time, would have less of an impact on the AONB.

7.3) *Is the use of employment land for the proposed Innovation Village compatible with the long term employment objectives for Harwell Campus and the Enterprise Zone?*

10. No. The Inspector for the Part 1 Plan commented specifically on this point when recommending that 2 draft allocations adjacent to Harwell Campus be deleted from the Plan. The Inspector stated at paragraph 11 that:

"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 an 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.” (our emphasis)

11. Whilst the current draft housing allocation is located within the Harwell Campus curtilage, we do not consider that there has been any material change in circumstances since the previous Inspector’s Report (November 2016). Furthermore, the use of employment land at Harwell Campus for residential use undermines the Council’s objective of securing 70% of the District’s job growth in the SEVSA.
 12. We, therefore, conclude that the proposed residential use would not be compatible with the Long Term objectives for Harwell Campus and the Enterprise Zone.
- 7.4) *Is the proposal for an Innovation Village appropriate when considered against reasonable alternatives (if any) in the light of site constraints, infrastructure requirements and potential impacts? Have these been adequately assessed? How would the Innovation Village be delivered and managed in the long term to ensure it meets its objectives? Are the detailed requirements in Core Policy 15b and the site development template requirements – both general and site specific – justified and would they provide an appropriate basis for the preparation of a Supplementary Planning Document for the site?***
13. The Harwell Campus Exceptional Circumstances Report (Exam Doc NAT04) looked at alternative sites to developing at Harwell Campus. This was informed by a Site Selection Report (Exam Doc TOP02.1). The methodology for selecting sites is set out in TOP02.1.
 14. The Council have clearly undertaken an exercise to try and justify development at Harwell Campus and as part of this process, the land to the east of High Street, East Hendred was considered as part of the Site Selection Process. The site was discounted at Stage 3 of the site selection process, along with all the other sites in East Hendred that are located in the AONB. It is, therefore, surprising that Harwell Campus was ultimately recommended as an allocation for 1,000 dwellings when it to, is also located in the same AONB.
 15. It is not clear how the Innovation Village will be managed as it is not yet established what role or function the new dwellings to be provided at the campus will have. Are they to be there to meet the needs of employees who work at Harwell Campus or are they to be open market houses that can be occupied by anyone, including those that do not work on the campus? Depending on who the housing is intended to cater for, will dictate how it is managed and whether or not it can be concluded that it is genuinely meeting the housing needs of the District as a whole. Clearly, if the intention is to provide housing specifically aimed at people who work within the Campus, these dwellings cannot realistically be considered to be available to meeting the housing needs of the District as they would not be available to anyone who may wish to

occupy them. Conversely, if they were available for anyone to rent or buy, this could undermine the objective of providing accommodation close by the campus for employees to use.

7.5) *Are the detailed boundaries of the site justified and supported by proportionate evidence? Is the estimate of site capacity justified? Is the expected timescale for development realistic?*

16. We consider that the estimate of site capacity at Harwell Campus is significantly overestimated and that the number of dwellings envisaged cannot be accommodated within the proposed allocation.
17. The draft allocation extends to 36.78 hectares with an estimated capacity of 1,000 dwellings. A gross density would result in 27 dph. However, this takes no account of the need to incorporate open space and road infrastructure within the site. Furthermore, due to the rural nature of the site we would not anticipate a particularly high density being considered appropriate across the site. As a rule of thumb, we would expect that at least 33 – 40% of the site would not be developable. Reducing the developable area by a third would result in 24.53 hectares of developable land being available for housing. Taking a conservative density approach of 30dph would result in a capacity of 735 dwellings, as opposed to the 1,000 identified in the Plan.
18. To achieve 1,000 dwellings on a net basis, development would need to occur at over 40 dph, which we consider is wholly unsuitable for the site's location.
19. High density apartment blocks or single person living accommodation akin to student accommodation may help with increasing numbers, although due to the site's location, we consider it unlikely that development would be permitted to exceed three storeys in height, and therefore, this would not make much difference to overall numbers.
20. In terms of delivery, the Plan runs to 2031. It is unlikely to be adopted until early in 2019. Given that a planning application will need to be prepared and determined with an appropriate Section 106 package, we would not expect an outline application of this magnitude to be determined until mid 2020 at the earliest. This itself would be an appropriate approach given the need for land sales and the resolution of reserved matters. We consider that a start on site is highly unlikely to be achieved by the end of 2021, with the first completions coming forward in 2022. This would leave some 9 years to deliver 1,000 dwellings at a rate of over 110 a year. As alluded to above, it is not clear whether these dwellings are intended to be open market houses or whether they are aimed specifically at employees working in businesses on the Campus. Either way, we consider that this is a very niche market to attract a sales rate of over 100 dwellings year and therefore consider that it is unrealistic that the allocation will deliver as expected.

7.6) *How would the proposal for the Innovation Village relate to the village of Harwell and other nearby settlements? What new services, facilities and infrastructure links would be provided and is this realistic? Is the proposal viable? Would it comprise sustainable development?*

21. We consider that the proposed Innovation Village will relate poorly to the village of Harwell and other settlements within the vicinity. Existing residents would need to get in their cars to access the new facilities to be provided on the campus.
22. We also query whether there is going to be sufficient demand on the campus from residents to sustain the range of facilities and services that are envisaged. It may be sufficient during the week when the working population is present, but what happens at weekends when people are not at work? Similarly, and in light of the point touched on above, how many dwellings will need to be provided until there is a need for more shops and a primary school for example?
23. There is, therefore, a question mark over whether the proposal is viable and as set out above, are the dwellings to be provided as general market housing or specifically to meet the needs of employees on short term contracts working at the campus. If the latter, is there a need for a primary school as younger workers on short term contracts don't tend to have families with children living with them.
24. In light of our concerns over how the Innovation Village would function and relate to existing settlements in the District, we do not consider that it would comprise sustainable development, and that in our view, a more sustainable option would be to look at housing sites in existing settlements such as that to the east of High Street, East Hendred. The site can be developed out without the need for significant infrastructure works, and could contribute houses to the five year land supply within 3 years.