

VALE OF WHITE HORSE LOCAL PLAN 2031 PART 1

EXAMINATION IN PUBLIC STAGE 1

MATTER 3

STATEMENT ON BEHALF OF

THE HARWELL CAMPUS PARTNERSHIP

AUGUST 2015



INTRODUCTION

1. This statement is made in response to the Vale of White Horse Local Plan 2031 Examination in Public (EiP) Stage 1 on behalf of the Harwell Campus Partnership (“the Partnership”). The statement relates to Matter 3 – Spatial Strategy and Housing Supply Ring Fence.
2. A Statement of Common Ground (SoCG) has been agreed between the Council and the Partnership. It states that the Partnership broadly supports the overall spatial strategy and the Science Vale “housing supply ring fence”. The SoCG also identifies a key point covered in Matter 3 on which the Partnership does not agree. This statement expands on that point.

MATTER 3 – SPATIAL STRATEGY AND HOUSING SUPPLY RING FENCE

3. As stated above, the Partnership is broadly supportive of the spatial strategy set out in the Local Plan. It welcomes the Council’s commitment to “focussing sustainable growth within the Science Vale area” by inter alia:
 - Promoting Science Vale as a world-class location for science and technology-based enterprise and innovation, especially the Enterprise Zone sites at Milton park and Harwell Campus; and
 - Allocating appropriate land for strategic housing growth to help improve the self-containment of the area (Figure 4.1 p34 of the Local Plan).
4. The Harwell Campus is central to the future growth and success of Science Vale. The Campus is identified as a focus for employment (Core Policy 6) and housing growth (Core Policy 4). However, to be **justified** and **effective** and to meet in full the Government’s three dimensions to sustainable development, the Local Plan should maximise the potential for integration between job growth and housing but in a way that minimises the impact on the environment.
5. Against this background:
 - The Partnership **supports** the proposal to ‘ring-fence’ housing supply in the Science Vale area;
 - The Partnership **supports** the allocation of land north-west of Harwell Campus as a site for 550 homes;
 - The Partnership believes that there should be a zone of influence around Harwell Oxford within which one of the tests for development is whether it would prejudice the future growth or success of Harwell Oxford;
 - **Objects** to the allocation of land East of Harwell Campus as a site for 850 homes; and
 - The Partnership is proposing an amended Policy CP4 in which the reference to land East of Harwell is deleted and replaced with an enlarged allocation on the land at North-West Harwell for 1,400 homes.

The land East of Harwell Campus should be **deleted** from the Plan and **replaced** by an additional allocation on the Harwell Campus itself (see the Consequential Changes to the Plan set out **Appendix A**).

6. In the context of the development plan, fully integrated employment and housing allocations at the Harwell Campus are the only way of meeting in full the Council's objectives of ensuring that:
 - Sufficient homes are provided to help meet the future labour supply requirements of the local economy;
 - Making full use of brownfield land;
 - The housing allocation that is intended to support growth at the Harwell Campus is tailored to meet the Campus's specific needs; and
 - The necessary growth is delivered as sustainably as possible, ensuring there are enough jobs and new facilities provided alongside new homes whilst also minimising any harmful impacts.
7. It is evident from the East of Harwell Campus Development Template¹ that that proposed allocation is predicated on:
 - The international and national importance of the Harwell Campus - without the Campus and the growth potential of the existing science and research development this proposed allocation would not be being promoted;²
 - The continued and future success of Harwell Oxford as a focus for employment growth;
 - Full integration with the Science Vale Oxford infrastructure package;
 - The provision of a sustainable and integrated exemplar mixed use community providing new housing and new jobs; and
 - The provision of additional high quality community facilities to complement those already available on the Campus.
8. The most effective way to ensure that these objectives are met is to fully integrate the employment and housing components on the Harwell Campus. Indeed, without proper integration there is limited justification for development on a wholly green field site in the AONB (see below), especially when 1,400 homes can be accommodated primarily on less conspicuous brownfield land (albeit that this is also in the AONB) within or associated with the Campus itself (see below).
9. Moreover, housing development planned on the doorstep of the Harwell Campus but over which the Partnership has no effective control could damage Harwell Oxford and achieve the opposite of the intended effects. The land to

¹ Local Plan 2031, November 2014, Appendix A, page 35 - 37

² SA Report page 60, paragraphs 13.3.4 – 13.3.7

the east also occupies a strategic location as the obvious long-term candidate for the expansion of the campus and, particularly, as the expansion land for nationally important 'big science'. Such important potential should not be prejudiced by more footloose residential development – particularly when the land is available actually within the Campus. The land to the north and north-west of the Campus has been recognised as suitable for housing development in the emerging Local Plan but, due to its topography and tree cover it is not well suited to large scale employment uses.

10. Effective delivery of the 850 homes earmarked for the land to the east of the Harwell Campus would be best achieved by recasting the policy and concentrating development on the Harwell Campus. This will ensure that the housing development will come forward as part of a fully integrated, mixed-use, Framework Masterplan led scheme for the whole campus.
11. Crucially, it will also give the Partnership full control over the type and tenure mix of housing. This is important in terms of providing for the specific needs of the Campus, which, on the basis of its vision for the site and market research undertaken among existing tenant organisations is for:
 - A geography of innovation where the social and professional networks of the residential quarter and the wider Harwell campus can interlink;
 - A residential quarter where there is a seamless link between the amenities that serve the wider Campus and those that are aimed primarily at the residential quarter;
 - Smart campus-wide infrastructure, environmental and energy strategies;
 - Exemplar design; and
 - A significant proportion of low-cost medium and long-term private rented sector accommodation suitable for students, PhDs and Postdoc, and administrative staff on lower pay scales.
12. Based on the master planning work done to date, the Partnership has identified 46.74 hectares of the Campus (out of a total 292 hectares for the campus as a whole) that is suitable and available for residential development, just over 60% of which is previously developed and all of which, save for the green field element of the North of Harwell allocation, is already earmarked for development in the adopted Vale Local Plan 2011.³ This land comprises 6 distinct parcels of land A – F. These parcels are identified on **Plan KK1** and described in Figure 1 below. They fall partly within the EZ at Harwell, partly within the area highlighted under saved Policy E7 in the adopted Local Plan 2011 relating to development at Harwell Campus and wholly within the ring-fenced area for Harwell proposed under Core Policy 5 in the new Plan.
13. The back land nature of the majority of this land makes it less attractive for prestigious R&D employment-generating development – the focus of that development is likely to be the higher profile eastern side of the Campus closest

³ See Vale Local Plan 201, Policy E7

to the A4185. The topography and landscape characteristics of the land to the north and north-west of the campus are such that it is better suited to housing than it is to employment uses.

Figure 1. Areas Suitable for Residential Development

	Land	Brownfield/Greenfield	Hectares
A	The North of Harwell allocation	Part greenfield; part brownfield	18.93 ha
B	Farm land between the former prefabricated housing site and the western-most part of the North of Harwell Campus allocation	Greenfield	7.5 ha
C	The former Aldfield prefabricated housing site	Brownfield	10.2 ha
D	Existing commitment south of Icknield Way/north of Curie Avenue	Brownfield	6.04 ha
E	An area of existing development to the west of the committed site	Brownfield	4.56 ha

14. Adopting the Council's preferred density of 30 dwellings per hectare⁴, parcels A – F can accommodate **up to around 1,400 homes**. After netting off the current proposed north-west Harwell allocation of 550 homes, this means that there is capacity for a further 850 homes, which would be a direct replacement for the East of Harwell allocation. **Plan KK2** shows illustratively how this quantum of development can be accommodated within land parcels A – E. It also shows a principal means of access via the existing Curie Avenue entrance; a significant area of structural open space centred on the existing lagoon and woodland; areas where by virtue of the existing mature tree cover lower density development is perhaps more appropriate; the scope for integrating housing and employment via the existing north-south link along Eighth Street and by locating the 'mixed use core' along that route; and, in the heart of the development, a site for a primary school.

⁴ Core Policy 23 & Topic Paper 4: Housing, page 48, paragraph 5.48

15. Further housing on the Campus is essential and is required regardless of whether the East of Harwell allocation is confirmed on the basis that it would:
- Add to the vitality of the Campus;
 - Sustain existing and newly planned services and facilities;
 - Contribute directly to the provision of additional social and physical infrastructure;
 - Be phased to suit employment growth rates;
 - Provide the opportunity for the type and tenure of housing to be managed to maximise the benefit to the Campus (including PRS and discounted rents); and
 - Make best use of brownfield land in the area.
16. This is in stark contrast to the proposed East of Harwell allocation, which would:
- Detract from the vitality of the Campus by competing for and potentially duplicating services and facilities;
 - Be phased solely on the basis of market demand;
 - Likely be limited to standard market and affordable housing;
 - Prejudice the long term growth of major science development; and
 - Be wholly on green field land.

North Wessex Downs Area of Outstanding Natural Beauty (AONB)

17. The *Vale Landscape Capacity Study (February 2014) – Part 2*, which was published as part of the evidence base for the February 2014 *Housing Delivery Update* concluded that the East of Harwell Campus site:
- Had medium/high landscape sensitivity and medium/high landscape value;
 - Overall, its landscape capacity was “low”;
 - Housing on this site would have an adverse impact on the AONB; and
 - No part of this site should be considered further as a contingency site on landscape and visual grounds.⁵
18. That assessment notwithstanding, the *Housing Delivery Update* proposed to allocate the land East of Harwell Campus as a site for some 1,400 homes on the basis that there were “unique and exceptional circumstances” (i.e. the sustainability of the Harwell Campus and its international reputation for

⁵ Vale Landscape Capacity Study (February 2014) – Part 2, pages 164 -169

innovation in science and technology) that supported further development within the AONB.⁶

19. In addition, the *Housing Delivery Update* stated that if the 1,400 homes were not integrated with the Harwell Campus, physically, functionally and in design terms and were not properly planned they would not be acceptable.
20. The *Vale Landscape Capacity Study (February 2014) – Part 2*, however concluded that the land north-west of Harwell Campus:
 - Had medium landscape sensitivity and medium/high landscape value;
 - Overall its landscape capacity was medium/low;
 - Limited housing on this site would have little impact on the AONB; and
 - Part of the site could be considered further as a contingency site on landscape and visual grounds.⁷
21. In the Sustainability Appraisal (SA) (October 2014) it states at paragraph 13.1.3 that on page 58 that:

“Following the Housing Update Delivery Consultation (February 2014), major concerns were raised by Natural England, and the AONB Management Board with regard to the landscape sensitivities of the AONB at the proposed strategic sites at North West Harwell Campus and East Harwell Campus on the ability to mitigate visual impacts satisfactorily.”
22. It goes on to state at paragraph 13.1.4 in the SA that:

“In recognition of the landscape sensitivities of these sites a Landscape and Visual Impact Assessment (LVIA) has been prepared to inform the scale and form of the development of land surrounding Harwell Campus to accommodate future residential development.”
23. The Council appointed Hankinson Duckett Associates to undertake this work (the original landscape assessment work having been carried out by Kirkham Landscape Planning/Terra Firma). Hankinson Duckett Associates identified seven land parcels. Two of these parcels were considered worthy of further work, and were sub-divided into eight sub-areas. Those areas are identified at figure 13.1 in the SA Report and comprise the entirety of the East of Harwell Campus allocation (divided into six sub-parcels) and the western (green field) element of the North of Harwell allocation.
24. The Hankinson Duckett Associates LVIA came to a different conclusion to that reached in the February 2014 *Landscape Capacity Study*. The results of the analysis of the East of Harwell allocation still confirmed that it had medium/high landscape sensitivity, medium/high landscape value and that its resulting

⁶ Local Plan 2013, Part 1, February 2014, page 10, paragraph 1.20

⁷ Vale Landscape Capacity Study (February 2014) – Part 2, pages 170 -176

landscape capacity was “low”. However, at page 9 in the main report it then states that:

“Potential impacts of housing development within this parcel - Developing the whole [of the East of Harwell Campus] parcel would harm the character and appearance of the AONB. New housing would be out of context with the existing settlement plan and highly visible from the surrounding rural landscape. Developing part of the parcel may have less significant impact.”

25. Hankinson Duckett also analysed the green field element of the North of Harwell allocation. That analysis concluded that its landscape sensitivity was “medium”; that its landscape value was “medium/high” and that its resulting landscape capacity was “medium/low”. This is consistent with the findings of the *Landscape Capacity Study of Contingency Sites*, which formed part of the evidence base for the *Housing Delivery Update* and which has been updated as part of the evidence base for the current draft Plan. That study, which was carried out by Kirkham/Terra Firma concluded that the land “north west of Harwell Campus” i.e. the entirety of the proposed allocation comprising greenfield and brown field land is “visually contained” and has “potential for housing...subject to more detailed study”.⁸

26. It goes on to state that:

“Potential for landscape mitigation and contribution to green infrastructure – landscape mitigation is more feasible in some parts of the parcel. The immature shelter belt could be strengthened and replicated without significant change or erosion of landscape character. The existing hedgerow along Icknield Way could be strengthened and extended. The planting along the A34 could be strengthened, which would improve the character of the parcel.”

27. It is self-evident that that there is an inconsistency between the conclusions in respect of the East of Harwell allocation in the original *Vale Landscape Capacity Study (February 2014)* and the recommendations from Hankinson Duckett Associates. This is in contrast to the position in respect of the North of Harwell allocation where both sets of consultants have concluded that the site has potential for housing. Even taken at face value, whilst parts of the land to the East “may have less significant impact”, the studies are consistent in recognising the potential for development to the north and north-west of the Campus.

28. Returning to the SA Report, under the heading *Further Justification* paragraphs 13.3.4 – 13.3.6 read as follows:

“13.3.4 Two of the proposed sites (East and North of Harwell Campus) are located within the North Wessex Downs AONB. Paragraph 116 of the NPPF states that planning permission for major developments in the

⁸ Landscape Capacity Study of Contingency Housing Sites Additional to Sites Assessed in *Landscape Capacity Study: Contingency Sites ((Feb 2014)* Kirkham Landscape Planning/Terra Firma

AONB should be refused except in “*exceptional circumstances*” and where it can be demonstrated they are in the public interest.

13.3.5 Harwell Campus is an existing and well established development within the North Wessex Downs AONB. The Campus is of international importance and national economic significance as a world-class centre for science, technology and innovation, and is home to the European Space Agency. It is estimated that at least 5,400 net additional jobs will be created at the Campus.

13.3.6 The Council believes that the international significance of the site provides uniquely exceptional circumstances to justify supporting further development in this AONB location. Any development will need to be sensitively planned to minimise impact on the AONB whilst delivering a high quality and sustainable village community. The original proposals have been refined and reduced based on more detailed landscape advice, restricting development to areas where, with planting screening, it would not cause significant visual harm.”

29. That justification, of course, would be all the more relevant to a proposal for housing on largely brownfield land actually within and integrated directly with the Campus.
30. The findings and recommendations that flow from this assessment are recorded in Part 3 of the SA. The findings in respect of the East of Harwell Campus site are summarised in the table at pages 110-112 in the SA report. In that table the commentary records “major negatives” in respect of cultural heritage, townscape and landscape and the requirement to reduce air, noise and light pollution. The “major negative” in respect of the first issue stems from the site’s location in the AONB and its “low landscape capacity”.
31. The findings and recommendations in respect of the North of Harwell Campus site are recorded at pages 112 and 113 in the SA report. That site records only one “major negative” in respect of the requirement to reduce air, noise and light pollution. It is recorded as having a “minor negative effect” in terms of cultural heritage.
32. There is still a requirement on Local Planning Authorities (LPAs) when they consider allocating land in the AONB for development, and on landowners and developers when making planning applications, to consider brownfield land ahead of greenfield sites (NPPF, para 111) and to assess the detrimental effect on the landscape and to show how this could be moderated (NPPF, para 116). More particularly, paragraph 116 of the NPPF requires that:

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated that they are in the public interest. Consideration of such applications should include an assessment of:

- 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 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.”
33. This suggests that the land identified above at the northern end of the Harwell Campus should be considered ahead of the land to the east. In this regard, it is self-evident that further development on brownfield land (and land already committed to development) within the existing campus, where there is capacity for additional housing without compromising the campus’s primary focus on employment-generating development, will cause less harm to the AONB than development on adjacent green field land.

Meeting Business and Employment Needs

34. The Partnership’s proposed enlarged housing allocation includes 28.3 hectares of EZ land (areas B – E on Plan KK1). The Harwell Campus EZ extends in all to 94 hectares. There is also a further 28 hectares of EZ land at Milton Park. In addition, there is an additional 35 hectares of non-EZ land at Harwell Campus, which formed part of the allocation in the adopted Vale Local Plan 2011, and which is ‘saved’ in the emerging Local Plan. The EZ land at Harwell and Milton Park totalling 122 hectares and the additional 35 hectares are identified in Core Policy 6 as strategic sites for future employment development and form part of a total allocation of 219 hectares. It states at paragraph 4.24 in the emerging Local Plan that this land will deliver approximately 23,000 jobs, which is sufficient to meet the Council’s assessed need.
35. In its response to Matter 2, the Partnership has submitted evidence to show that 23,000 jobs can be delivered on significantly less than 219 hectares of land and that consequently, there is scope on the Harwell campus to meet in full its employment target and to accommodate up to 1,400 homes i.e. the 550 homes allocated on land North of Harwell and the 850 homes currently proposed on the land East of Harwell.

APPENDIX A

CONSEQUENTIAL CHANGES TO THE LOCAL PLAN

Set out below in red are the changes that need to be made to the Draft Plan as a consequence of the submissions set out above. Changes will also be required to the explanatory text and to a number of other figures.

Core Policy 4: Meeting Our Housing Needs

Change the “South East Vale Sub-Area” table as follows:

Settlement/Parish	Settlement Type	Site Name	Number of Dwellings
Harwell Campus	Larger Village	East of Harwell Campus	850
		North-West of Harwell Campus	550 1,400
Harwell		West of Harwell	200

Amend the North of Harwell Development Template (Appendix A) as follows:

Use: Around ~~550~~ 1,400 homes, subject to masterplanning

Key Objectives:

- The development of this site shall take into account the design and layout of the existing commitment to the south (permission for 120 homes) and be master planned to collaborate with the East of Harwell Campus to deliver a self-sufficient and sustainable community.
- To contribute to balanced employment and housing growth in the Science Vale area.
- **To ensure that the tenure and type of housing provided is tailored to meet the specific needs of the Campus.**
- To contribute towards infrastructure in the Science Vale Area Strategy as set out in the Oxfordshire Local Transport Plan.
- To ensure that development is sensitively planned to reflect the site's location within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).

Urban design principles:

- Masterplanning should take into account the strategy for growth in this area and ensure that development positively contributes to the wider objectives of Science Vale; a vital area for UK economic growth.
- Proposals should have regard to the recommendations set out in the Harwell Campus Landscape and Visual Impact Assessment (LVIA).

Higher density development should be concentrated in the southern ~~previously developed~~ part of the site.

- The design of development should reflect the ~~existing character of the Harwell Campus~~ ~~character of the adjacent Harwell Campus~~, creating a cohesive identify for the ~~development Campus~~ as a whole.
- Adopt a permeable, perimeter block layout to optimise connectivity within and beyond the site to employment, housing and facilities.
- Carefully consider street frontages in order to create an appropriate building line and incorporate active frontages.
- Public open space should form a well connected network of green areas suitable for formal and informal recreation
- Buildings should be predominantly two storeys.

Utilities:

- Upgrade the sewer network.

Access and highways:

- Investigate access arrangements.
- Site access would be taken from A4185 Newbury Road at the location of the existing residential access.
- Contribute towards any necessary mitigation measures identified through the site Transport Assessment.
- Provide improved pedestrian and cycle links to Chilton Primary School.
- Site layout should ensure public transport can be accessed through the site or that the site is within walking distance of improved bus services within the campus.
- Construct Curie Avenue and internal roads within the new development to Oxfordshire County Council adopted road standards.

Social and community:

- A new 'two form entry' primary school (on 2.22 ha of land) will be required to accommodate growth at ~~East of Harwell Campus and~~ North West of Harwell Campus. This is likely to be located ~~on green field land within the allocation thereby minimising the impact on the AONB. to the east of the East of Harwell Campus site and contributions will be required towards it.~~
- Contribute towards the expansion of the appropriate secondary school in the area.

- Contribute towards improving the existing services and facilities on the ~~adjacent~~ wider campus.
- Allow appropriate access to existing public open space and recreational facilities ~~opposite the site and/or~~ within the campus.

Environmental health:

- Decommission the sewage treatment works.
- Undertake contaminated land investigations to ensure that the land is safe and suitable for the intended use.

Landscape considerations:

- The site lies within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). A comprehensive landscape scheme will be required to minimise impact on the AONB.
- The mass and scale of the built form will need to be designed to avoid being visually obtrusive when viewed from the surrounding countryside within the AONB.
- Landscaping and design features should be used to minimise any noise and light pollution impacts on the AONB.
- Plant a new woodland edge along the northern and western boundary.
- Retain existing trees and hedgerows where possible.

Biodiversity and green infrastructure:

- A campus-wide mitigation strategy will be required and a suitable receptor site/ nature reserve identified.
- Contribute towards redressing the identified Green Infrastructure deficit in the area surrounding Harwell.

Flood risk and drainage:

- Incorporate Green Infrastructure within SUDs to improve biodiversity and water quality.
- Mitigation measures may be required to prevent any detrimental impact on groundwater quality.
- A porous pavement system rather than soakaways should be used due to the underlying chalk geology.

Delete the East of Harwell Development Template at Appendix A.

Core Policy 6: Meeting Business and Employment Needs

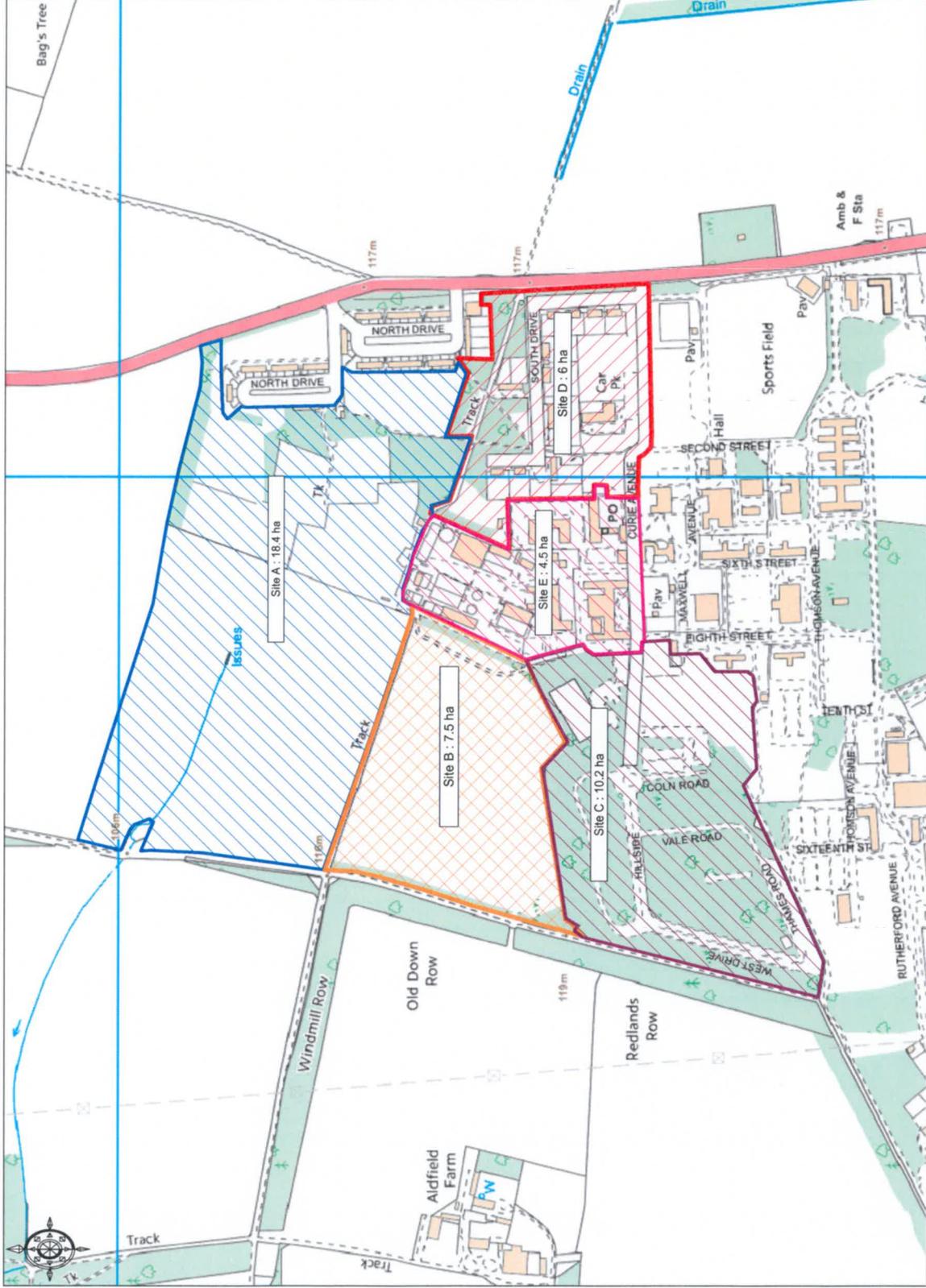
Amend the table in Core Policy 6 to reflect the reduction in employment land at the Harwell Campus.

Amend the table in Core Policy 15 to reflect the increase in housing numbers at the Harwell Campus and the consequential reduction in the allocated employment area and to reflect the deletion of the East of Harwell housing allocation.

Add in proposed policy wording that notes that:

- because investment opportunities will arise at Harwell there will be a need for flexibility and speed of response; and
- development that is not masterplanned within the vicinity of the Harwell Campus will always be tested to ensure that it does not prejudice the long term growth and success of the facility.

Harwell Science Campus Land Available for Residential Development

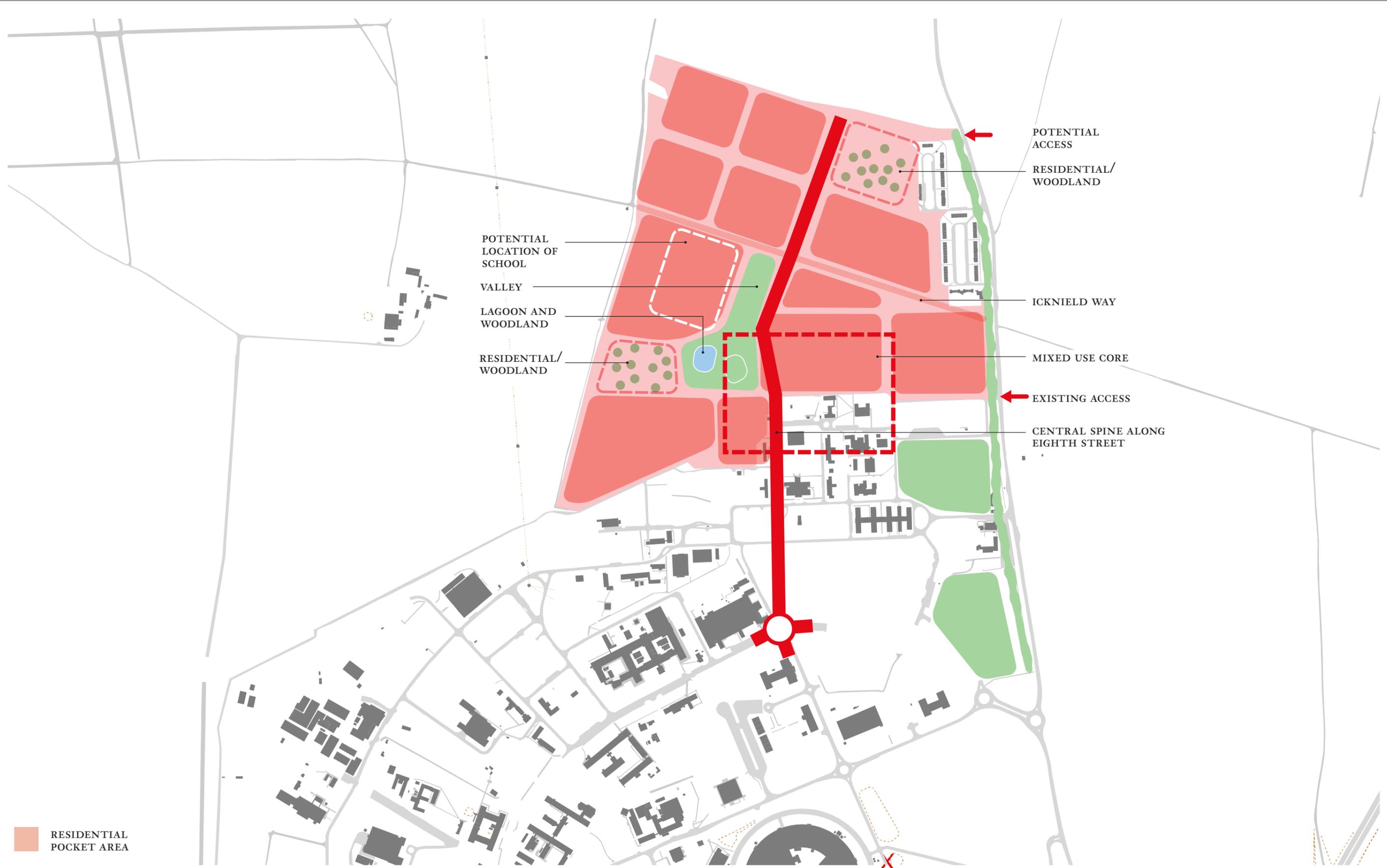


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Plan KK1





Revisions		
No	Date	ApprNote

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