

EIP Stage 2- comments from Save Chilton AONB

Key: *EiP/Vale text in red*

Matter 6 – Proposed Housing Sites in the North Wessex Downs Area of Outstanding Natural Beauty

6.1 Having regard to the exceptional circumstances and public interest tests set out in para 116 of the NPPF, are the Strategic Housing Allocations (sites 12 and 13) proposed in the AONB soundly based? In particular:

(a) what is the need for the housing development, including in terms of national considerations?

As part of their justification for proposing substantial numbers of homes in the NWD AONB, the VWHDC assumed that a significant number of people residing in these homes would also work on the Harwell Campus.

Data from the petition submitted against building 1400 houses on predominantly greenfield sites in the NWD AONB by Chilton residents during the 2014 VWHDC consultation period indicated that only ~13% of adult residents actually worked on the Harwell Campus.

A more recent survey carried out solely on Chilton Field by Chilton Parish Council (December 2015) showed that only ~10% of householders surveyed worked on the Harwell Campus.

Therefore, the need for housing on greenfield land outside the perimeter of the Harwell Campus is not soundly based, particularly Site 13 East of Harwell Campus.

The full housing need can be met on sites outside the North Wessex Downs AONB and/or with some limited housing situated entirely within the perimeter of the Harwell Campus, said housing being tailored specifically for the needs of the Campus Employers.

(b) what is the likely impact of permitting, or refusing, the housing development on the local economy?

There is unlikely to be any negative impact on the Harwell Campus economy by refusing Site 12 North of Harwell Campus (550 homes) and Site 13 East of Harwell Campus (850 houses).

There are already plans to build ~15,000 houses by 2031 immediately outside the NWD AONB around Greater Didcot; a town that has recently established Garden Town status. All of these planned for houses will allow ready and easy access to the Harwell Campus, support the local Science Vale economy and comply with the NPPF paragraphs 115 and 116.

Questions arising potential double counting, or even oversupply of housing, in the Greater Didcot area should be clarified as both VWHDC and SODC are claiming that their housing sites around the Didcot area are being built to support growth within the Science Vale, including the Harwell Oxford Campus.

The designation of Greater Didcot as a Garden Town will attract future investment to address road infrastructure around Didcot with the inclusion of:

- Northern Didcot perimeter road
- Town Centre pinch point removal

These infrastructure improvements mean that sites at North East Didcot (2100 houses) and Ladygrove East (300 homes) in South Oxford District Council (SODC) will be well placed to provide housing for any potential Harwell Campus employees and are equally, if not better, suited to supporting the rest of the Science Vale than housing on the Harwell Oxford Campus itself due to proximity to better public transport, e.g. Didcot railway.

(c) is there scope for providing for the housing development outside of the AONB?

Yes. If required, the full housing development could be provided for outside of the AONB.

There is currently a planning application outside the AONB at Didcot Power Station (Economic Growth Area D) including 400 houses (VWHDC Planning Application P15/V1304/O); these houses have not been accounted for in either the VWHDC or SODC housing numbers and there is the potential to increase the accommodation on this site.

There is further scope for using the uplift in housing numbers from 2,500 to 4,500 at Valley Park to provide housing outside the NWD AONB. The VWHDC suggested that this uplift in numbers could be used to provide for Oxford's unmet housing need, a suggestion that was dismissed by Oxford City Council as being inappropriate for Oxford, "*This site is entirely unsuitable for meeting Oxford's needs. It is some 13 miles from Oxford, and adjoins the A34 Milton Interchange.*" (Source: HEAR 51 letter from David Edwards, Executive Director, Oxford City Council to Ian Kemp, Programme Officer, dated 7th October 2015). It is, by contrast, well placed to support the Science Vale and the Harwell Oxford Campus.

There is also a new development planned for the regeneration of the site opposite Didcot railway station. The plans include 300 new city-style apartments; it is not clear whether these housing numbers have been included in either the VWHDC or SODC current Local Plans (Source: "Expression of interest in a Greater Didcot Garden Town", SODC, VWHDC, OCC and OLEP).

(d) what is the likely effect of the development on the environment, landscape and recreational opportunities having regard to the potential for moderation?

No moderation that will adequately address the impact of the Harwell East Site 13 allocation is possible. The impact of the development of a Campus part of Site 12 (see Campus Partnership's alternative) could be moderated by constraining it to the brownfield elements of that proposal and using the existing greenfield elements of the proposal (Site B and western part of Site A) to act as landscape buffers.

In addition to a full LVIA, assessments of noise and light pollution from all commercial and residential development within the Harwell Campus have to be carried out and their cumulative impact on the tranquillity of the AONB quantified. Only with all of this information will the full urbanising impact on the AONB be apparent.

6.2 Would the alternatively proposed housing site at Harwell Campus:

(i) accord with the exceptional circumstances and public interest tests?

If housing is to be permitted within the North Wessex Downs AONB, then development of the brownfield component(s) of the Campus Partnership proposal (Campus plots C, D, E and the Campus-bounded eastern part of site A) may be worthy of consideration.

Whilst not fully compliant with the NPPF paragraphs 115 and 116, some aspects of the alternative proposal from the Harwell Campus Partnership are more soundly based than Sites 12 and 13 allocated in the VWHDC Local Plan:

- (i) It lies within the general already-built campus complex and mostly on land previously built over. As such it would be a valid brownfield redevelopment location and, in practical terms, less visually intrusive to the AONB

- (ii) It does not encroach upon arable (greenfield) land within the AONB, thus avoiding the unwitting establishment of an unnecessary and unwise precedent for future encroachment on the rural character and status of the AONB.
- (iii) It better complies with the aspirations of Greater Didcot Garden Town (Source: Pg 11-13, "Expression of interest in a Greater Didcot Garden Town", SODC, VWHDC, OCC and OLEP):
 - a. *"We will protect the character and setting of the historic villages that ring Didcot, with green infrastructure and green garlands that will enhance their setting in the valued landscape",*
 - b. *"These new neighbourhoods will be supported by new and engaging town quarters that make good use of previously developed land",*
 - c. *"...with protective green garlands to maintain distinctiveness and separation between town and village".*
- (iv) Campus Site B and the Greenfield western side of Site A should not be used for housing, and instead should be used to provide a landscape buffer and screening opportunity
- (v) It is a compromise that would not unduly compromise the statutory protection of the AONB and would not provide a precedent for future development pressure encroaching on the AONB outside campus boundaries.

(ii) more appropriately meet housing needs?

If housing is absolutely necessary within the NWD AONB, then aspects of the Harwell Partnership proposal could more appropriately meet the specific housing needs of the Campus. Redevelopment of the brownfield sites within the Campus perimeter, specifically tailored to meet the needs of Campus employers, would be acceptable use of the land.