

EIP Stage 2- comments from Chilton Parish Council

Key: *EiP/Vale text in red*

Chilton Parish Council comments/responses in black

6.2 See Matter 9

Matter 9 – Strategy for South East Vale Sub-Area (CP15 and CP16)

9.1 Other than in connection with AONB issues (considered in Matter 6) are the Strategic Housing Allocations listed in policy CP15 soundly based and deliverable?

(f) East of Harwell Campus (site 13)

(g) North-West of Harwell Campus (site 12)

The Plan claims that the employment needs of the Campus represent the exceptional circumstances needed to justify allowing developers to build 1400 open market houses at sites 12 and 13. The assertion being that houses built by developers adjacent to the Campus will be bought by those working on the Campus and so houses must be built adjacent to the place of employment. This objective is well-meaning planning in terms of sustainability but naively misunderstands/ignores the complex 21st century home-travel-work patterns of many households. To test this assertion with factual data, this Council conducted a survey in December 2015 of households living in the newly built Chilton Field estate (a development of 275 houses completed 2013 on the southern edge of Harwell Campus). It showed that only 10.4% of householders surveyed who were in employment actually worked on the Campus (see case study appendix for more details)¹.

9.2 Are there other sites which would more appropriately meet the identified need for new housing?

Yes, many more homes could be accommodated at Didcot Power Station (Economic Growth Area D), closer to the planned new employment opportunities. The conjunctive use of this large brownfield site should include a more substantial housing development element so that workers will not only be located close to employment opportunities but also near to the town amenities of Didcot and to its rail link. On transport sustainability grounds alone, increased residential use of Growth Area D would help help maximise use of this rail facility, the only station in the Vale.

Alternatively, the uplift in numbers at Valley Park proposed to meet Oxford's unmet need, which Oxford City Council doesn't like (they say it is too far from Oxford), could be used to negate the need to build within the AONB other than within the previously developed area of Harwell Campus (airfield brownfield site).

We reiterate there is not yet enough joint appraisal of housing need and development location by the Vale and SODC, even though they share the Science Vale cachet and both now include/adjoin Didcot with its new Garden Town status.

MOVED FROM 6.2 Would the alternatively proposed housing site at Harwell Campus:

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

Whilst not being compliant with the exceptional circumstances and public interest tests set out in para 16 of the NPPF, parts of the alternative proposal from the Harwell Campus Partnership address shortcomings in the Local Plan's promotion of Sites 12 and 13. Our view is that development of the brownfield component of the Campus Partnership proposal (their plots C, D, E

¹ As at 31st Dec.2015, survey data collection ongoing.

and the Campus-bounded eastern part of site A) are worthy of serious consideration for the following reasons;

- (i) It lies within the general already-built campus complex and mostly on land previously built over and now remediated (where necessary). 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. Instead Campus Site B and the Greenfield western side of Site A would provide a landscape buffer and screening opportunity for the establishment of a new medium-size village in the AONB
- (iii) This view is compliant with official government policy on redevelopment of land which started life as an airfield brownfield site (such as Harwell Campus). In a recent written response to a Parliamentary petition, the government clarified its position on whether all of such brownfield sites automatically become developable, stating that

*“Brownfield land is defined, for the purpose of national planning policy prior to and in the National Planning Policy Framework, as land that has been previously developed. Airfields, as land that has been previously developed, are therefore regarded as brownfield land. A central premise of the policy has been and remains that **it should not be assumed that the whole of the curtilage of a brownfield site should be developed.***

This has been made clear in the definitions of previously developed land set out in Planning Policy Guidance 3 (Housing - revised 2000), Planning Policy Statement 3 (Housing – 2003 as revised) and the National Planning Policy Framework (2012).

*The definition in Planning Policy Guidance 3 included a footnote which defined curtilage and stated that “where the footprint of a building only occupies a proportion of a site of which the remainder is open land (such as at an airfield or a hospital) **the whole site should not normally be developed to the boundary of the curtilage.** The local planning authority should make a judgement about site layout in this context, bearing in mind other planning considerations.”*

Ref: https://petition.parliament.uk/petitions/106779?reveal_response=yes

- (iv) The Partnership view (which is convincing) is that there is sufficient developable land for employment available elsewhere on campus, freeing up these intra-campus locations for housing specifically tailored to the expansion rate of the Campus itself. That housing demand is the very reason for the Vale’s inclusion of Sites 12 and 13 in the Plan.
- (v) The Proposal would make provision for rented property to service the needs of campus employers with visiting scientists/engineers and their families. This is an employment-related housing requirement conspicuously absent from the Vale’s housing need assessment. We think that is an omission from the Plan.

(ii) more appropriately meet housing needs?

The development of the brownfield portion of the Campus Partnership proposal would provide space for the development of a viable community of c.850 homes, which, being within the control of the Harwell Campus, can be better focussed to meet the needs of employers on the Campus – i.e. the intended and stated aim of the housing in this part of the Vale.

It is a compromise that would meet the needs of the Harwell Campus for local housing and a substantial part of the more general demand for housing in the southern Vale. Moreover, it 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.

A development of this size (up to c. 850 homes) under the control of the Campus and being the size of a medium Downland village, would be big enough to provide the opportunity to showcase exciting small community housing and infrastructure designs with modern sustainability innovation, eminently suitable for a science/technology campus. Such innovative designs are seen in some self-build and small-scale developments but are lacking in the current offerings of the large national housebuilders. For examples of the latter see Great Western Park and Chilton Field.

9.4 Is the policy relating to Didcot A Power Station (CP16) soundly based?:

No, we believe that a more substantial housing development element is required for this Economic Growth Area D, so that workers will not only be located close to employment opportunities but also with easy, sustainable transport cycle/bus/walk access to the facilities offered by Didcot town and its rail link.

Case Study Appendix: Chilton Field employment-travel survey

Chilton Field is a recently-built 275-home commercial development built on former UKAEA land on the southern edge of Harwell Campus. The homes were occupied on completion between 2012-2014. The estate was developed jointly by two national housebuilding companies with extensive advertising. It comprises terraced, semi-detached and detached properties of 2-5 bedrooms, 75% of which are general market housing, with 25% affordable housing (of which 25% is shared equity).

Chilton Field is physically separate from the rest of Chilton and analogous to the Local Plan's proposed Sites 12 and 13 in both proximity to the Campus and housing mix. The Plan claims that the employment needs of the Campus represent the exceptional circumstances needed to justify allowing developers to build 1400 houses in the AONB. The assertion being that houses built by developers adjacent to the Campus will be bought by those working on the Campus and so houses must be built adjacent to the place of employment.

To test this assertion, the Parish Council initiated a travel survey in December 2015 of households living in the newly built houses at Chilton Field. It shows that only 10.4% of householders surveyed who were in employment actually worked on the Campus.

These results suggest that in reality only a small proportion of the occupiers of housing built on the proposed rural exception sites would work on the adjacent Campus. More limited employer-focused housing development, within and closely linked to the Campus, would be more likely to meet the proximity-to-work sustainable living objectives of the Plan. A spinoff advantage of such an arrangement would be development staged to match actual rather than projected employment expansion. Also the opportunity for more comprehensive social and leisure facilities than would otherwise be financially practicable for a rural area development as residents could also share employee facilities provided by the >150 firms located on the Campus.