## Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dr Stephen King
Comment ID	LPPub58
Response Date	07/12/14 21:46
Consultation Point	5.59 Paragraph ( <u>View</u> )
Status	Submitted
Submission Type	Web
Version	0.1
Q1 Do you consider the Local Plan is Legally Compliant?	Yes
Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)	No
If your comment(s) relate to a specific site within	East Harwell Campus (Harwell and Chilton Parishes)

a core policy please select this from the drop down list.

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If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities

**Q3 Do you consider the Local Plan complies with** Yes **the Duty to Co-operate?** 

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Paragraph 5.59 states that the provision of new housing in this area will help to improve the self-sufficiency of the South East Vale and provide opportunities for living closer to places of work. The *How the South East Vale Sub-Area will change by 2031* statement, page 68, says ? *New housing at the Harwell Oxford Campus will have provided an exemplar development and function as* 

a thriving community, successfully integrated with the science campus and provide accommodation for many of the site?s employees?.

The Local Plan is proposing 1400 homes, split between two locations, in the immediate vicinity of the Harwell Oxford Campus. Whilst it is true that these locations would be within easy walking/cycling distance of the Campus and thus in many ways would be ideal for employees at the Campus, there is a fundamental flaw in the argument: namely that it presupposes that employees will be able to occupy the new homes. There are only two ways that can happen, either the Campus employers take a substantial financial stake in the new homes (and there is no evidence that any are keen to take this route), or the developers agree to covenants restricting sales to Campus employees (unlikely) or the homes are offered at substantial discounts to Campus employees.

Most employees at the Harwell Oxford Campus are employed by the Government on increasingly below-market salaries, with a surprising fraction receiving State benefits. It is difficult to envisage developers being prepared to ?gift? away enough of their profit margin in discounts for the utopia envisaged by the Local Plan to become a reality. The far more likely scenario is that the vast majority of the proposed homes would be sold on the open market generating, as a consequence, a minimum of 5600 additional vehicle movements in the vicinity of the Campus each working day (1400 homes x 2 cars x travel in and out), most of which would be in addition to the increased traffic arising from increased employment at the Campus.

Indeed, the URS Strategic Analysis of the Local Plan Part 1 ?states ?There is a likelihood that residents in the new housing areas at Harwell Oxford Campus would access employment opportunities further afield. This has the potential to increase traffic on the A34 which is already known to be congested and operating over its designed capacity in peak periods?. The 2001 Census for Harwell Ward indicated that ~95% of employees at the Campus did not live in the villages of Harwell or Chilton. And if the Milton Park Travel Survey 2012 (source: Figure 6-1) is representative, employees will be commuting from as far afield as Swindon, Newbury, Reading and Oxford. The average commuting distance for those living in the Vale of White Horse is 16 km (source: 2011 Census).

Creating a new small town on the edge of the Harwell Oxford Campus does not address the needs of the Campus employees unless other instruments are brought to bear. Indeed, it would be counter-productive to the success of the Campus.

One might also add that enclosing the UK?s premier science and technology campus (as the former Minister for Universities & Science and the Secretary for State for Business have called Harwell Oxford) within housing estates hardly conveys a world class impression of British science!

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

To make the Local Plan sound, legally compliant, and protect the North Wessex Downs AONB it is necessary to moderate threats to the tranquillity and character of the AONB from large-scale housing developments leading to increased traffic (and its associated air, noise and light pollution).

This could be achieved by reallocating all housing proposed in the vicinity of the Harwell Oxford Campus (1000 homes) <u>except that wholly contained within the perimeter of the Campus (400 homes)</u> to other sites in the Vale of White Horse outside of the AONB (of which sites for 2490 homes have already been identified), or by reducing the SHMA for the Vale of White Horse district by 1000 homes.

The North Wessex Downs AONB should also be entirely removed from the Science Vale ?Ringfence? in order to protect it from future speculative development.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not

normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 If your representation is seeking a modification, No - I do not wish to participate at the oral do you consider it necessary to participate at the examination oral part of the examination?