

**Representations on the
Local Plan 2031 Part 1 Strategic Sites and
Policies
and
CIL Preliminary Draft Charging Schedule
and
Design Guide October 2014**

In respect of:
Land at South Harwell

On behalf of:
Macktaggart and Mickel and Mr and Mrs Carlisle



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1.0 Introduction

1.1. McLoughlin Planning has been instructed by developers Macktaggart and Mickel and the landowners Mr and Mrs Carlisle (hereafter collectively referred to as the respondents) to respond to the:

- Local Plan 2031 Part 1, Strategic Sites and Policies document.
- CIL Preliminary Draft Charging Schedule

1.2. The purpose of this document is as follows:

- To set out the respondents' general comments on the plan.
- To set out respondents' support and comments on promoting development land at Harwell



2.0 General Representations on the Local Plan 2031

- 2.1. Comments on the Plan are as follows:

Core Policy 1

- 2.2. The respondents support the Plan's approach in recognising the presumption in favour of sustainable development.

A Justified Plan (page 17) and Core Policy 2

- 2.3. The respondents consider that the plan does not have a robust and credible evidence base in respect of allocations made at Harwell Science Campus. Other representations will detail. The respondents' concerns with the approach adopted in the SA with respect to this area.
- 2.4. It is correct to note that the Plan has a weakness in respect of the Duty to Co-operate in that this work is on-going and a review of the plan may be necessary in light of additional work coming forward on the Oxfordshire SHMA and the difficulties of Oxford City to meet its OAN. However, in the interests of seeing a plan adopted and the delivery of housing in a co-ordinated and planned manner (as per paragraph 17 of the Framework), there should be the recognition that the Plan's housing target and allocations underpinning that target are treated as minimum rather than maximum.
- 2.5. The benefit of this approach is that it allows the core principle of a plan-led system to be met and meet the requirements of the third bulletpoint in under paragraph 17 of the Framework.

Spatial Vision

- 2.6. The Spatial Vision is supported in general in that it clearly sets out an aspiration for economic growth in the District. However, The respondents have the following observations to make.
- 2.7. The Vision rightly identifies Harwell Campus and the Science Vale area as being an internationally significant location and that it will expand to provide additional jobs. It is considered that the Vision has missed the opportunity to focus on Harwell Campus being at the centre of a new community, where additional residential and social development will take place to create a more sustainable international science hub.



- 2.8. The concern is that by not making reference to large allocations at the larger villages, the Vision is underplaying the important contribution certain locations make in providing new housing.

[Strategic Objectives SO1 to SO4](#)

- 2.9. The respondents support the strategic objectives as drafted and consider that the proposed allocation new housing development at Harwell Campus will help in meeting these general objectives.

[Strategic objectives SO6](#)

- 2.10. The respondents strongly support the need for the continued development of the Science Vale area, given its national and international importance.

[Strategic Objectives SO8 and SO9](#)

- 2.11. The respondents support the need to promote the sustainable modes of travel, the focus of these strategic objectives should be more directed to providing a real choice of modes, rather than targeting a specific objective on reducing the need to travel. This is based on the fact that paragraph 29 of the Framework requires the transport system to be “balanced” in favour of sustainable modes and promoting choice, which has to reflect the difference between urban and rural locations. Development at the Campus provides an excellent opportunity to link a major employment site with little supporting housing, with significant volume of new housing.

[Strategic Objective SO11](#)

- 2.12. The respondents question the need for developments to achieve a “high quality design standard”. Paragraphs 56 to 68 of the Framework provide comprehensive coverage on the need for good design. The key paragraphs are 59 and 60, which strike a cautious note about the use of Design Codes and LPAs imposing architectural tastes and styles. As drafted, the strategic objective appears to imply that there is a Council standard to be met regarding design, which could be potentially prescriptive and contrary to national guidance.
- 2.13. In addition, the Strategic Objective has to recognise that the need to conserve and landscape assets. As will be explored in other representations, there is a requirement for landscape issues to be dealt with in a manner proportionate to their level of designation. As drafted, the Strategic objective could lead to a disproportionate level of weight being applied to landscape assets.

[Core Policy 3 and Figure 4.2](#)

- 2.14. The respondents have the following observations about the settlement hierarchy.



- 2.15. Given the level of development already at the Campus and what is proposed on Campus in any event, it is considered that the location either needs to be treated as a Local Service Centre.

Core Policy 4

- 2.16. As per the representation on CP3, there is a need for Harwell Campus to be classified as a Local Service Centre.
- 2.17. In terms of the housing requirement for the District, The respondents support the 20,560 set out in the Plan, but see this as a **minimum target**, on the basis of the following analysis of the Plan's housing requirement.
- 2.18. The SHMA has followed national guidance. It has taken the whole of Oxfordshire in entirety and then assessed each LPA within it. The SHMA has concluded that there is an identified need for between 4,678 – 5,328 homes per year over the 20-year period. In the County. All sensitivity-testing models considered have found that a higher level of housing is required than the household projections. The level of housing proposed is necessary to support committed economic growth; to support delivery of affordable housing; and to support an improvement in the affordability of housing over time.
- 2.19. The SHMA acknowledges that the level of housing is considerably higher than previous delivery, providing evidence that the housing provision has not kept up to pace with the housing need. The uplift (taking the mid point of the need range) is 17%. The SHMA has considered a number of scenarios, these have built up the housing need.
- 2.20. It supports the Committed Economic Growth Scenario which has considered policy influences on economic growth, such as planned development and initiatives related to the Science Vale Enterprise Zone, Oxfordshire City Deal, North West Bicester Eco Town and other planned infrastructure investment. In doing so it takes account of both factors that can be expected to stimulate 'above trend' growth in employment as well as factors that may depress it.

"The CE and SQW Report recognises that there are factors which could depress growth in employment, including public sector spending restraints and competition from surrounding areas including South Warwickshire, the Thames Valley and London. It identifies a number of potential risks to delivery of the Committed Economic Growth Scenario, including competition for skilled labour and delays in the delivery of infrastructure (including potentially shortages of commercial accommodation). However it does not regard housing delivery as a particular risk, setting out that past rates of employment and housing growth in Oxfordshire and comparator areas do not point towards evidence that employment and housing growth have constrained one



another. Overall it concludes that delivery of the Committed Economic Growth Scenario is realistic.

The Committed Economic Growth Scenario is based on the potential for economic growth in Oxfordshire and its constituent districts, linked to economic drivers and their potential to stimulate jobs growth. It is demand-driven. It is not driven by an assessment of supply-side factors such as employment land availability or supply. Further information regarding how the economic scenarios were constructed, and the degree to which key economic growth initiatives/ projects informed this, are set out in the CE and SQW Report.”

- 2.21. Table 90 of the SHMA brings together the evidence on housing need. Conclusions on housing need have been drawn using The starting point is the assessment of housing need based on demographic trends, including where applicable provision for addressing the past shortfall in housing delivery against the South East Plan between 2006-1130. Consideration is given to whether there is a need to adjust upwards the level of housing provision in order to support Committed Economic Growth. The results of this are then compared against the indicative modelling of the level of housing provision which might be required to meet affordable housing need in full; as well as the wider evidence of market signals. This is used to assess whether a further adjustment to the assessed housing need is necessary.
- 2.22. This process has been used to derive conclusions regarding housing need in each authority. The specific circumstances of Oxford in regard to both affordability pressures and need for affordable housing justify a substantial upwards adjustment to the assessed need, relative to the projections based on past population change and committed economic growth. This upward adjustment aims to improve the supply-demand balance for housing and improve affordability over the longer-term. A single figure is set out for the Vale of White Horse as this is directly aligned to the Committed Economic Growth Scenario and does not require further adjustment in relation to the affordable need scenario unlike the other LPAs within the housing market area.
- 2.23. The SHMA concludes that across Oxfordshire, there is an identified need for provision of between 4,678 – 5,328 homes a year over the 2011-31 period. This level of housing provision is necessary to support committed economic growth; to support delivery of affordable housing; and to support an improvement in the affordability of housing over time. The figures for individual local authorities are set out in Table 90.
- 2.24. For the Vale of White Horse, the evidence indicates a need for 1028 dwellings per annum (2011-31) to support the Strategic Economic Plan. This is based on the



supporting Committed Economic Growth. This did not require further adjustment in relation to the affordable need scenario unlike the other districts within the housing market area.

Core Policy 7 and CIL Preliminary Draft Charging Schedule

- 2.25. The respondents recognise the need for S106 contributions and CIL charges, provided that they meet the tests in national guidance and CIL regulations. As a starting point, the IDP submitted with the Plan identifies a series of requirements for Harwell Campus.
- 2.26. The CIL figure proposes a charging rate of £120 per sq.m. for the Harwell area. This figure is informed by the Viability Study which accompanies the CIL Schedule. The approach is supported by a CIL Viability Study (October 2014). Section 3 of the Report deals with development viability and at page 21 there are a list of the strategic sites, along with the estimated infrastructure costs associated with them. The respondents concerns to the CIL Charging Schedule relate to whether the infrastructure costs have been robustly tested. The respondents are aware of the North Shrivenham allocation where the estimated cost in the Viability Study is circa £4.1 million and the actual S106 package being sought by the Council for the first phase of development is circa £5.6 million. A difference of circa £1.5 million is a serious miscalculation.

Overview

- 2.27. The approach adopted by the Plan in this respect is unsound. CIL Charging Schedule needs to be established by setting a charging schedule, which has been subject of public consultation and an examination. At this stage, the IDP is a list of Plan requirements, which identify a significant level of funding to be derived from CIL. At this stage and based on knowledge of experience of other projects elsewhere, there are concerns about the total infrastructure costs being applied and these could be viewed as being underestimated.

School provision

- 2.28. In general terms, The respondents recognises that there could be a need for a new primary school. However, this has yet to be fully resolved and the concern is that the amount of development being proposed in Harwell clearly expects the eventual allocation to deliver the funding required to deliver the school. However, there is no consideration about costs being deducted because of the land values given away to accommodate the school, or what will happen to the current school, which is relatively new. This is in contrast to the Abingdon allocations, which incorporate costs for acquiring land in their calculations.



Leisure contributions

- 2.29. The IDP identifies circa £2.9 million of CIL contributions towards leisure provision either on site or off-site based on the findings of the Nortoft Study split between the two current allocations. The respondents strongly object to the totals set out in the IDP as these have to be tested against whether the contribution sought are fairly related to the development in the first instance.

Figure 5.4

- 2.30. In conjunction with other representations there is a need for the figure to be updated to reflect the fact that Harwell Campus will become a Local Service Centre and not a Larger Village, as shown on the plan.

South East Vale Vision (page 84)

- 2.31. The respondents support the vision for Harwell Campus, as documented in the Vision. Given the level of development being proposed (1400 homes) there is a need for the Vision to actively recognise the resulting form of development and in effect the creation of a new community.

Core Policy 15

- 2.32. The respondents support the principle of allocating 1,400 additional homes to Harwell Campus however, it objects to the allocations made in the Plan.
- 2.33. The starting point for the allocations is the need to help the Council meet its objectively assessed housing need as well as take into account clearly identified economic strategies for promoting growth in the District.
- 2.34. In planning policy terms, paragraphs 115 and 116 of the Framework are the points at which development in the AONB are considered. Essentially there is a need to meet the exceptional circumstances and public interests test. The Campus being located on a disused WW2 Airfield and having been developed in a time which pre-dated AONB means that a sizeable, highly specialised employment site has been created which cannot be easily relocated to another site in the district or elsewhere in the country. The need for additional housing at the Campus is clearly designed to address the serious mismatch in the availability of jobs at the campus (circa 5000 employees) and the clear lack of nearby housing. Additional development in this location will help support the campus by providing much needed housing in a location adjacent to a major local, national and international employment site.
- 2.35. The second test is the cost and scope for providing the development elsewhere. In this case, the above justification shows that it is not possible to provide the employment development elsewhere as the facilities clearly exist. In terms of the



options of providing development elsewhere, whilst this could be achieved, it would lead to unsustainable patterns of development being maintained as there would be no additional housing development being provided at the Campus.

- 2.36. The final test is whether the proposed development has a detrimental impact on the environment./
- 2.37. Supporting the Plan is a SA and associated Landscape Reports. The starting point is that the Campus is. As part of the evidence base, the SA and associated reports splits up land around the Campus into 8 parcels for analysis. All of the parcels are considered to have a medium to high sensitivity score. In addition, the reports refer to whether the associated parcels also have an impact on the skyline. The implications of this are significant in that skyline impact is a serious constraint and demonstrates that development of the affected parcels will have a significant effect on the appearance of the environment.
- 2.38. In terms of the allocations made, both the allocations of Parcel 2 and Parcel 3 have been designed in such a way as to minimise the visibility of the development from surrounding receptors. This in turn has led to the level of development of Parcel 3 being reduced from 1,400 (as per the previous version of the Local Plan) to 850 with the balance transferred to Parcel 2.

Core Policy 22

- 2.39. As drafted, the Policy is not in accordance with guidance in the Framework. The risk with the Policy is that the reliance on the SHMA could lead to prescriptive decisions being made by the Council about the type of open market housing being provided, which could lead to possible imbalances in the provision of housing on a site. In contrast, paragraph 50 of the Framework requires LPAs to “plan for a mix of housing” this is not prescribing a mix of housing. The test for an alternative non-SHMA mix is excessive in that it requires an alternative to be demonstrated which could bring into question the validity of the SHMA.

Core Policy 23

- 2.40. The respondents support the need to make effective use of land. However, the policy is not consistent with national guidance in that the Framework (para 47 last bulletpoint) allows LPAs to set their own density figures to reflect local circumstances. There is no requirement in the Framework for “specific local circumstances” have to be indicated to justify lower density levels.



Core Policy 26

- 2.41. Further clarity is required from the policy as to whether it is seeking a specific provision of lifetime homes on all sites or whether this expressly focuses on age-restricted dwellings.

Core Policy 36

- 2.42. The provision of broadband services and infrastructure is not within the remit of the development industry, but rather BT Openreach, the operator of the telecoms network. The concern is that the definition of “appropriate infrastructure” could be used to require developer to provide systems, which are simply not within their control or technical capacity to do so.
- 2.43. A further concern is what constitutes “superfast broadband” and how this requirement will be assessed through the planning application process.

Core Policy 37

- 2.44. The respondents support the need for a high quality design, however, the policy should reflect the fact that of the criteria identified, there will be conflicts in the design of new development, which will see compromises being achieved between the competing criteria.

Core Policy 38 and Design Guide

- 2.45. The respondents’ comments on the policy are as follows:

Part 1a

- 2.46. The first bulletpoint requires a masterplan which sets out a vision for the development. This is simply not achievable on a single plan. A vision comprises of a number of elements, all of which cannot be translated into a single masterplan. A better alternative is to seek the provision of a Vision Statement, which draws together all the aspirations for a scheme.
- 2.47. The final masterplan related bulletpoint requires an indicative layout to be provided. This is not appropriate at the scale of a major development site for use as a Design Strategy. The wording of this requirement is at odds with other Statutory Instruments governing the level of detail required for outline planning applications. Essentially, it places a higher burden on applicants than what is required for in other Regulations.

Part 2

- 2.48. Bulletpoints 3,4,5 and 6



- 2.49. The respondents are of the view that the requirements are not necessary or appropriate for a design and access statement, especially in the case of outline applications.

[Core Policy 39](#)

- 2.50. The policy's objectives have to be seen in the context of what is relevant to any given application for the Council to determine and the Policy cannot be used by the Council to seek to achieve heritage asset protection and re-use where it is not relevant or connected to a planning application.
- 2.51. In dealing with setting of heritage assets, where heritage assets are being used to inform the layout of development proposals, there is a need to ensure that the level of influence exerted by assets on such proposals is proportionate and evidence based.

[Core Policy 40](#)

- 2.52. The requirements of the policy are onerous and not in accordance with national guidance. Matters relating to building performance are best suited to be addressed through the Building Regulations process.
- 2.53. In terms of the need to orientate habitable rooms within 30 degrees of south, this will not be possible on all development sites for all units proposed and the need to demonstrate that it is not appropriate to do so places an unnecessary burden on developers, especially where the layout of a site and its physical characteristics are the key in addressing this issue.

[Core Policy 43](#)

- 2.54. Welbeck object to criterion viii of the policy as it could be used to support a sequential approach to the development of sites. Paragraph 113 of the Framework requires agricultural land quality to be "taken into account" and does not advocate a sequential approach.

[Core Policy 44](#)

- 2.55. The Policy is contrary to national guidance by virtue of the fact that the policy seeks to protect the "landscape" of the district from harmful development. Guidance in paragraph 113 of the Framework requires criteria based policies against which proposals can be assessed. This also requires plans to make distinctions between international, national and local designations.
- 2.56. As drafted the Policy sets out a blanket approach to landscape protection, irrespective of the level of designation afforded to it. This could lead to disproportionate weight being attached to landscape features by the Council.



- 2.57. In addition, it is not clear as to how the Plan expects developments to enhance damaged landscapes outside of land, which is immediately under the applicant's control.

Core Policy 45

- 2.58. The respondents support the provision of green infrastructure (GI) on development sites. However, there are the following concerns with the policy and supporting paragraphs:
- 2.59. The joint Green Infrastructure Strategy document has yet to be produced and does not appear to be available for consultation. This could lead to the Strategy setting disproportionate levels of GI in new developments. It is essential that the Strategy is available for examination.
- 2.60. The respondents question the role and function of the Green Infrastructure Audit in the Plan's preparation. Whilst the standards set out are obtained from Natural England, these are not necessarily relevant to the District as the pattern of accessible natural green space is fractured across the district. The concern is that this audit represents an unachievable set of requirements for development sites.
- 2.61. The Plan cannot require development proposals to improve assets, which do not relate to those proposals. As drafted, the Policy could be used to require improvements to GI or Conservation Target Areas, which are outside of an applicant's control and are unrelated to any application proposals.



3.0 Harwell North and Harwell East Allocations (CORE POLICY 15 and APPENDIX A)

- 3.1. The respondents object to the North of Harwell Campus and East of Harwell Campus allocations for the following reasons:

[Approach adopted by the Local Plan](#)

- 3.2. The Plan is clearly looking to provide a significant amount of housing at Harwell Campus to provide a better balance of jobs and housing, to generate more sustainable patterns of development. In terms of the approach adopted, the Plan has taken a landscape-led proposal, which seeks to use the AONB designation as the key driver in determining which parcels of land should be released for development. This approach runs counter to the historic evidence base, which had previously discounted development at Harwell Campus because of its AONB sensitivity. Whilst The respondents support the Plan's bold approach to allocate significant housing at the Campus, it considers the landscape focus for site selection to be too narrow a brief and leads to a disjointed pattern of development. This conflicts with other objectives of national guidance.
- 3.3. The starting point to the respondents' concerns in this respect is the spread of land-uses across the campus. Clearly, the main focus of the campus is the employment element, but there is a core of new house building and a primary school to the south eastern corner of the campus site. Present in this core is also a garden centre and other land-uses not associated with the Campus. The effect we have is that there are two centres at the Campus, the employment and the school.

[The need for a Design Led Allocations](#)

- 3.4. The development proposed seeks to disperse development to the northern and eastern edge of the campus. Development of the northern parcel, whilst less sensitive in landscape terms, is divorced from the school and southern focus of residential development by the Campus itself. With regard to the East Campus site, again, whilst parts are closer to the school and existing development, parts of the site will be remote to residential development.
- 3.5. The relative weakness of this approach can be highlighted against the guidance in national policy in both the Framework and the PPG.
- 3.6. Taking the AONB issue to one side as it is a common factor between all the sites, paragraph 17 of the Framework sets out core principles for planning. The second bulletpoint states that planning is not an exercise simply based on "scrutiny" but



should instead be a “creative” exercise where the focus is on enhancement and improvement of places. The approach adopted by the Plan clearly lacks a creative approach and is one simply focused on scrutiny. This is demonstrated by the way the allocations were chosen, from a landscape led approach. The clear rationale in the evidence base is to find the parcels of land which are the least sensitive in AONB terms and see these developed. The problem with this approach is that AONB sensitivity is medium to high around the Campus, with no assessment parcel enjoying a clear advantage over the other. This has led to a Plan being produced, which has failed to consider the creative potential delivering 1,400 new homes can achieve. This is evidenced through the lack of Campus periphery masterplanning or any meaningful analysis of that issue.

- 3.7. Secondly, in highlighting the PPG guidance, attention is drawn to “Design” part of the PPG (ID26).
- 3.8. Starting with “Why does good design matter” Para 001, the PPG considers that design is about “creating places” and responding in both a practical and creative way to provide function and identity to a place. Against this guidance, the approach for the two allocations is flawed. This is because both allocations look to reflect on the design and their relationship with the Campus and guiding development in line with the LVIA. These are two schemes which do not have a focus on the surrounding countryside and making a connection with it or indeed using it to help generate a sense of legibility to any development. This is driven by the fact that both sites are flat, relatively devoid of any notable natural features and have no opportunity to link to the wider area.
- 3.9. This is in sharp contrast to South Harwell option being promoted in these representations. It is openly accepted that from certain points on the Ridgeway and other PROWs, the site is visually prominent, flat and open and shares some of the characteristics of the allocations. However, the key critical difference between this proposal and the allocations is that the site is always seen in a view where the wider Campus features heavily and where there is considerable appreciation of the scale and quality of the Campus development. In effect, the landscape of the Harwell South site is compromised by its unique neighbour, the Campus to the north and this provides an excellent opportunity to provide a form of development, where:
 - Layout and relationship with the Campus is one critical aspect to development.
 - Layout and relationship with the Ridgeway and elevated parts of the AONB is a second critical aspect to development.



- 3.10. In dealing with the first point, the current interface between the Campus and the site is poor, a simple chain link perimeter fence is provided with unsuitable screening planting in places. Development of the site can provide a better buffer between the natural environment and the campus. Key views, from the Ridgeway provide an opportunity for the urban form of any extension to be appreciated and become a feature in its own right. In contrast, development of the East allocation will create a “wall” of development leading up to a ridgeline, visually linking the Campus with Didcot to the north.
- 3.11. The second point is the how the relationship with the natural environment can be used to create a sense of place. Key to addressing this point is having views into but also out of development, to help residents and users of that space understand where they are in relation to their surroundings. In this respect, the Ridgeway’s elevated slope provides a fantastic opportunity for development to look out onto it, using landscaping and public open space to help frame it.

Specific Policy Commitments

- 3.12. The respondents have the following concerns to raise about the allocations:
- In both instances, there is the need to ensure that “historic” field pattern is maintained. This is an industrialised agricultural landscape where field structures are large and relatively devoid of notable features. There is nothing inherent in the existing boundaries that are worthy of retention.
 - Minimise impact on the AONB – again, in respect of the above, minimisation of impacts limits creative flexibility and by the same token, allowing for long distance views into the ridgeway, this will open the site up to views from it.
 - Mix of land uses – the combined total of both allocations is 1400 homes, yet in the development briefs for each site, there is only the reference to providing commensurate amounts of public open space (unspecified types) and generic guidance on the layout of new house and a primary school (East Harwell Campus allocation). There is no allowance in the allocations for any other community space or retail development.
 - Redressing open space deficiencies – the purpose of allocating sites is not to make up for existing deficiencies in open space.



4.0 Proposed Allocation - Harwell South New Community

- 4.1. The main purpose of these representations is to set out the landowners' aspirations for the development of circa 103 ha of land to the south of the Science Campus for a mixed used new community.

Site Features

- 4.2. The site is an area of predominantly flat, open agricultural land, broadly triangular in shape, with boundaries defined as follows:
- North – Harwell Science Campus.
 - East – A34.
 - South – Grimm's Ditch and the Ridgeway.
 - West – The Ridgeway.
- 4.3. The site sits in a natural "bowl" in the foreground of the Campus and visually it has very close links with the Campus and the adjacent residential and commercial development found there. Access into the site can also be achieved via the Chilton South junction on the A34.
- 4.4. In terms of the history of the site, it once formed part of RAF Harwell, a bomber base in the Second World War. Analysis of historic maps shows that this area served as a dispersal area for bombers sited at the base with a central taxi-way crossing the site from a NW to SE axis. At regular intervals, there were stands where the plans were stored, ready for operational use. Whilst the main body of the base was later converted to the Campus, the promotion site was returned to agricultural use. However, evidence of the historic use of the site still exists with the former taxi-way crossing the site being visible.
- 4.5. As set out above, the site's overall size is circa 103 ha and it is fully anticipated that this would provide for a wide mix of uses, commensurate with a new community. If it were the Plan's proposal to accommodate the whole of the Harwell Science Campus allocation to the site, it would be able to accommodate development based on an average density of 31 d/ha.
- 4.6. As part of on-going work, the respondents are considering technical issues and appraising the site and its development potential as well as consider a series of development options as either:
- A direct replacement for the Harwell East allocation.



- An allocation to take a percentage of the Harwell East and North allocations.

4.7. The benefits of the site and its potential allocation are set out below.

Landscape Impact

- 4.8. The key starting point is the landscape impact of the proposed development. As set out above, the site sits in a natural bowl between the science Campus and the Ridgeway with views across to both. The benefit of this location is that the site enjoys clearly defined physical boundaries, which can be used to formulate development proposals and create a new community, which has ultimate limits to development, and therefore, a sense of place.
- 4.9. The site has a number of reference points in terms of human activity, the key one is the Campus to the north which is visible from any point across the site. Views of the Campus are not limited to one specific area of aspect (unlike the allocated sites), and it is very clear that from within the site, this is not a wild open location, untouched by development.
- 4.10. The site is in the AONB and in accordance with guidance in paragraph 116 of the Framework, there is a need to consider the impacts arising from development.

The need for the Development

- 4.11. In terms of need, the Plan's consultation clearly shows that the Council is supporting an economic-led development strategy seeking to provide more homes and jobs in the District than would otherwise be needed by its growing resident population. In terms of justifying the need of providing a development of this scale in the AONB, it is essential that the Plan looks at the level of development both already at a proposed at the Science Campus and the role and function the Campus plays in the District and regional economy. The provision of a Synchrotron and other hi-tech industries has created a cluster of expertise and commercial enterprise, which is notably lacking any significant levels of housing immediately adjacent to it. These employers employ circa 5,000 people and the jobs provided are heavily dependant on being at this location, because of the significant investment in technology being provided there. The Campus, in effect is an industrial estate located in the countryside, very heavily reliant upon motorised travel to get to (whether that is public transport or private car). Failure to allocate housing adjacent to the Campus has implications for other planning policy objectives in terms of:
- Reducing the need to travel.
 - Not providing sufficient homes to meet recognised housing needs.



- 4.12. Not providing the homes and associated services and facilities to meet the needs generated by the specialist industries located in the Campus, reducing its attractiveness as a location for development at both the District, Regional and National levels.
- 4.13. Part of the case being advanced in these representations is that this site could come forward in conjunction with the allocation, reducing the level of development on the allocated site and allocating the balance to this one. The benefit with considering this option is that it allows for 2 strategic allocations to be delivered at the same time, serving the same area. This gives the Plan considerable flexibility and robustness in delivery as any shortfall of delivery on one site could be made up by accelerated delivery on the other and vice versa.

Cost and scope of providing it elsewhere

- 4.14. The next test is to consider the cost and scope of providing it elsewhere. In this instance, there is little in the current evidence base to support any conclusions about where else this could be provided and the cost of doing so. The site enjoys equal proximity to the Campus as the allocated site, with the added benefit that the Primary School is adjacent to the northern boundary of the site.

Detrimental effect on the environment

- 4.15. The final test relates to assessing the detrimental impact on the environment. In this case, the site has clearly defined limits and, unlike the allocation, can provide a high quality Masterplan-led scheme.
- 4.16. As can be seen from the Site Features set out above, whilst the site is in the AONB, the presence and visibility of the Science Park and other forms of adjacent development, combined with the noise and views of the A34, show that this is not an undisturbed area of AONB and that the tranquillity is compromised somewhat by the surrounding features. This is in contrast to the allocations, where it is possible to experience space and an expansive views of the surrounding countryside and horizon without any man made reference points.
- 4.17. Unlike the allocated sites, the site is visible from an elevated position at certain points along the Ridgeway. Whilst this impact is highly localised to views off the Ridgeway, it provides an unique opportunity for views of the site to appreciate not only the design of development, but also the layout and Masterplanning principles which under-pin it. This is in sharp contrast to the allocation, which will only be perceived as a wall of development simulating coalescence between the Science Campus and Didcot to the north. Other representations have examined the approach adopted by the Plan to the Masterplanning of the allocations (as envisaged by the SA) and this



shows an approach, which is specifically focused on impact minimisation, to such an extent, that the screening of any development becomes its key feature.

- 4.18. The development of this site will read as an extension to the Campus with a clear opportunity for a well-defined and landscape led southern boundary to development, a dramatic improvement to the arbitrary boundary drawn by the allocation. This means that whilst there will be an inevitable impact on the AONB, that impact is well managed and logical and contained.

Proximity to the Science Campus

- 4.19. The site's northern boundary is the Science Campus and public right of way, which runs the length of it, providing a permeable backbone to the site. This allows future residents to walk straight into the campus without any need to cross over heavily trafficked roads. In addition to the Science Campus is the primary school on its southern boundary, which is opposite the site. Again, development here can help provide a focal point for the community.

Sense of Place

- 4.20. As set out above, the site provides a case for creating a sense of place, defined by the strong physical natural and man-made boundaries to the site. Unlike the allocation, this is not a site defined by an arbitrary line in a field, but rather one which can identify with surrounding landscape features and use these to help define places and structure to the development so that residents can appreciate the natural environment around them outside of the site, as much as that within it.
- 4.21. Development of the site is also in-line with the proposed western expansion of the business Campus.

Promoting Healthy Communities

- 4.22. Paragraph 73 of the Framework requires access to high quality open spaces for sport and recreation. These will be provided as part of the development, but this location also benefits from wider linkages of public rights of way across the Ridgeway and surrounding countryside, immediately adjacent to the site. This site therefore provides greater recreational potential in the natural environment, in addition to that which would be provided within the built environment.

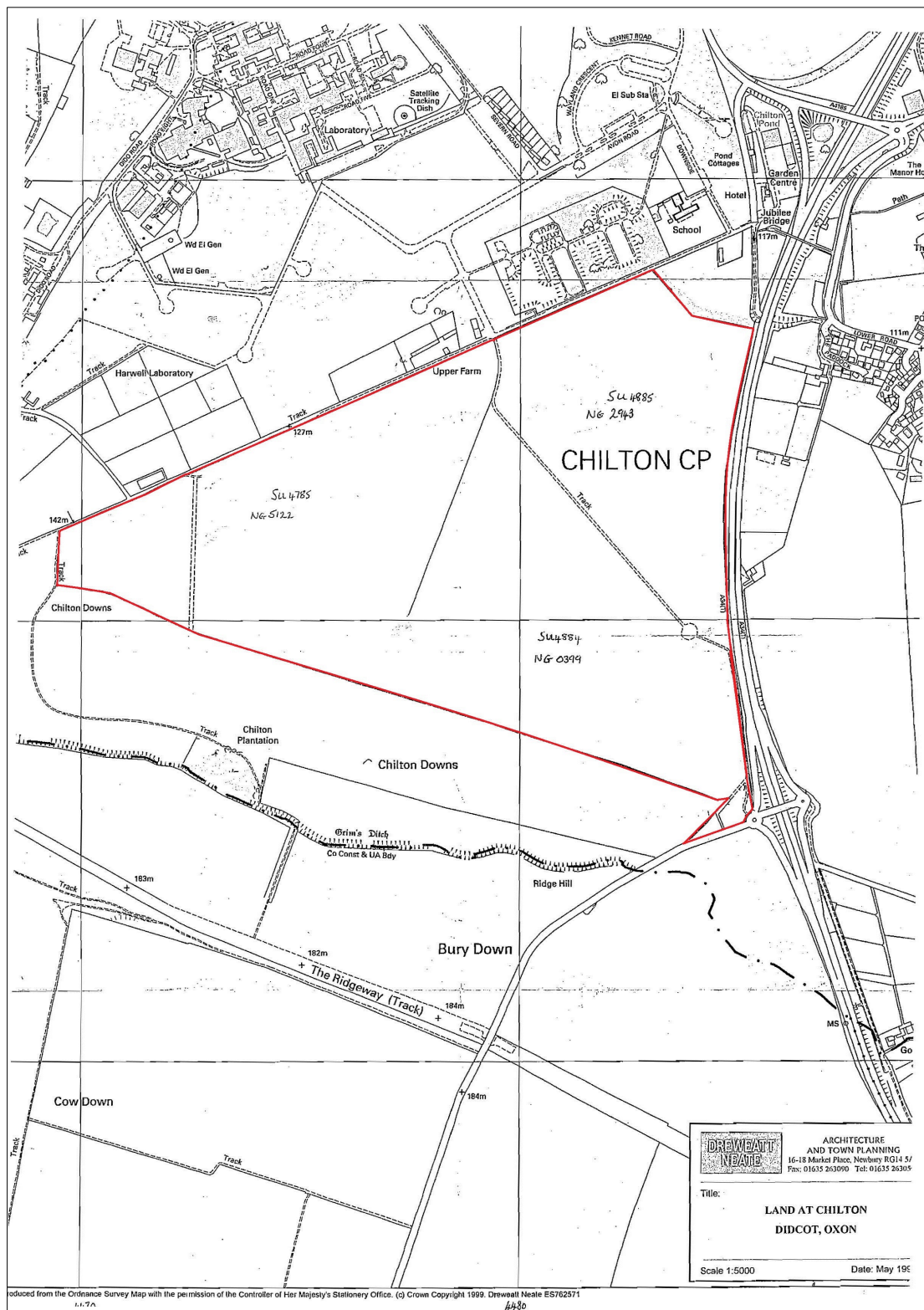
Highways

- 4.23. The TA accompanying the Plan has already considered the potential of the surrounding road network to accommodate the levels of development proposed. This site has the added benefit of having its own all-ways access point onto the A34

already provided. Furthermore, separate access can be achieved from the southern junction on the A34.

Extent of Allocation

4.24. The proposed allocation is set out on the Plan below (not to scale)



4.25.





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