



# Vale of White Horse Local Plan Part One: Strategic Sites and Policies Publication Stage Representation Form

Ref:

(For official  
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email [planning.policy@whitehorsedc.gov.uk](mailto:planning.policy@whitehorsedc.gov.uk) no later than Friday 19 December 2014 by 4.30 pm precisely.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

Title

Dr

First Name

Antony E

Last Name

Hughes

Job Title

Chairman

(where relevant)

Organisation

Keep Harwell Rural Campaign

(where relevant)

Address Line 1

c/o Kingswood

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Harwell

Line 4

Didcot

Post Code

OX11 0EJ

Telephone Number

E-mail Address

(where relevant)

## Part B – KHR Representation 1

Name or Organisation : **Keep Harwell Rural Campaign**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

**Core Policies 4 and 5**

Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

**X**

No

4.(2) Sound (Positively Prepared, Effective and Justified)

Yes

No

**X**

4 (3) Complies with the Duty to co-operate

Yes

**X**

No

*Please mark as appropriate.*

5. 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.

The Spatial Strategies in Core Policy 4, and Core Policy 5 that flows from it for South East Vale, are based on the exceptionally high forecasts of housing need from the Oxfordshire Strategic Housing Market Assessment (SHMA). This has been much criticised by the public, organisations (such as CPRE) and politicians alike. In an independent critique of the SHMA commissioned by CPRE Oxfordshire, a leading planning expert, Professor Alan Wenban-Smith, has concluded that the SHMA's estimate is likely to be 'grossly overstated by a factor of over two'.

From these criticisms Keep Harwell Rural understands that:

- ❖ The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable;
- ❖ The SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire. The housing need for the Vale increased from 13,130 to 20,560. In the Harwell area the increase was even more dramatic, from 2,150 to 5,350.
- ❖ Much of the forecast of need is based on another forecast that 85,000 new jobs will be created, attracting more people to move to the County. The forecast for the Vale is 23,000 new jobs by 2031 (paragraph 4.17) of which 15,850 are forecast for the Science Vale area in South East Vale (paragraph 4.27). However some of these figures seem themselves just to be based on questionable hopes of aggressive economic growth and house-building rates and have not been subject to public consultation or independent scrutiny.

However, we are not aware of any response to these criticisms or any attempt to instigate an independent review of the SHMA, and there is no evidence that the Vale has given them appropriate consideration.

The policies as they stand are therefore unsound because they are not justified.

6. 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 at 5 above where this relates to soundness.

To make Core Policies 4 and 5 sound they must have a housing needs basis that has been more critically examined than the SHMA, and has addressed the criticisms of the CPRE report. We would like to see the numbers and sites from the draft Local Plan of February 2013 replacing those in this version. Even if higher numbers are confirmed as the most reliable forecast, there should still be a mechanism for adjusting the plans should reality not match up to the forecast, or if infrastructure to cope with the large increase in housing cannot be delivered.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

**No**, I do not wish to participate at the oral examination

☒

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To explain adequately our concerns and represent the views of others in our community.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

16 Dec. 2014

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## Part B – KHR Representation 2

Name or Organisation : **Keep Harwell Rural Campaign**

3. To which part of the Local Plan does this representation relate?

Paragraph	<b>5.57</b>	Policy	<b>Core Policy 44; Saved Policy NE10.</b>	Proposals Map	
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4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<b>X</b>	No	
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes		No	<b>X</b>
4 (3) Complies with the Duty to co-operate	Yes	<b>X</b>	No	

Please mark as appropriate.

5. 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.

### Context

This representation relates to the following three related parts of the Local Plan:

1. Section 5.57 - the blue box on page 68 - which describes how the South East Vale Sub-Area will change by 2013.

Paragraph 5 in the blue box states: *"The countryside and villages will have maintained their distinctive character. The Larger Villages will have retained their separate identities...."*

2. Section 6 - Core Policy 44: Landscape

The first part of this Policy states: *"The key features that contribute to the nature and quality of the Vale of White Horse District's landscape will be protected from harmful development and where possible enhanced, in particular:*

- i. features such as trees, hedgerows, woodland, field boundaries, watercourses and water bodies*
- ii. important landscape settings of settlements*
- iii. topographical features*
- iv. areas or features of cultural or historical value*
- v. important views and visually sensitive skylines, and*
- vi. tranquillity and the need to protect and against intrusion from light pollution, noise and motion.*

*Where development is acceptable in principle, measures will be sought to integrate it into the landscape character and/or the townscape of the area.....”*

### 3. Saved Policy NE10: Urban Fringes and Countryside Gaps

This Policy contains a proposals map which shows that development will not be permitted in a specific area of farmland and open countryside plotted to the east of Harwell Village.

#### **Critique**

The Plan is unsound for the following reasons:

1. In the case of Harwell Village, the Plan has no effective mechanisms to deliver the aim stated in Section 5.57 that: *“The countryside and villages will have maintained their distinctive character. The Larger Villages will have retained their separate identities.....”*

The issue is that there is nothing **specific** anywhere in the Plan which defines **unambiguously and unsubjectively** what constitutes maintenance of distinctive character/separate identity for Harwell Village.

2. Similarly, the Plan has no effective mechanisms to deliver the aim stated in Core Policy 44 to protect *“important landscape settings of settlements.....important views and visually sensitive skylines...”*

Again, the issue is that there is nothing **specific** anywhere in the Plan which defines **unambiguously and unsubjectively** for Harwell Village what its important landscape settings, important views and visually sensitive skylines are.

3. The proposals map in Saved Policy NE10 from the 2011 Local Plan shows that development will not be permitted in a specific area of land plotted to the east of Harwell Village. This sounds as though it should give specific and measurable protection to the separate identity of Harwell Village. However it does not, because:

- (i) All of this area to the east of the A34 is now earmarked for development in the Plan to 2031, becoming what will be known as Valley Park. This threatens the retention of Harwell Village’s separate identity. It is Keep Harwell Rural’s view that it is inappropriate to rely on a trunk road (the A34) to provide the only separation between what is supposed to be a rural area (Harwell Village) and a decidedly urban area (Didcot, and its extensions of Great Western Park and Valley Park).
- (ii) Latest government planning policy has encouraged a flurry of recent speculative planning applications in the absence of a Local Plan, totalling over 200 houses within Harwell Village in the following locations: on Grove Road behind Manor Green; at Blenheim Hill; at Orchard Way and on the Reading Road. . The Plan itself also proposes a further 200 houses on Grove Road behind The Croft (‘West of Harwell’). This is in addition to the many thousands of houses planned in various further larger scale developments on the wider Harwell Parish land.

The proposals map does not reflect the impact of this impending speculative development on open land surrounding the village and does not adequately protect Harwell Village’s rural character and separate identity from further erosion in **all** directions.

#### **Comments**

To make Section 5.57 and Core Policy 44 of the Local Plan sound, the Plan must identify a rural gap right around Harwell Village where development will not be permitted. This particularly applies to the approach to Harwell from the east, but is not confined to this direction. This is because developments proposed in the Plan at the Harwell Campus and Milton Heights now represent, in the language of Saved Policy NE10, significant ‘settlements’

whose potential growth, in the future, could threaten the 'important open gaps' with essentially 'open or rural character' between them and Harwell Village.

Other Planning Authorities use this sort of approach to designate specific distances/dimensions of rural gap to safeguard villages against coalescence with an expanding neighbouring town.

For example, Bedford Borough Council's Allocations and Designations Local Plan July 2013 Section 15.6 covers the topic of coalescence between settlements. This seeks to prevent the coalescence of Bedford with nearby rural settlements by means of Local Gaps via Policy AD42 on page 97/Section 15.7.<sup>1</sup>

Another example is East Staffordshire Borough Council's Strategic Green Gaps Topic Paper September 2013. This seeks to prevent the coalescence of Burton-upon-Trent and Uttoxeter with surrounding villages by designating specific Strategic Green Gap areas.<sup>2</sup>

6. 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 at 5 above where this relates to soundness.

To protect its rural character and separate identify, the rural gap around Harwell Village should be that indicated by the hatched area on Fig 1, which represents a revised section of the proposals map to accompany Policy NE10.

An important component of preserving a rural gap between Harwell and Didcot is that there should be an impression of a natural green corridor along the B4493 to the east of the A34, between the A34 bridge and the edge of Great Western Park. This would significantly reduce the urban impact of Valley Park on Harwell. This is included in Fig 1 and was covered by a statement in the 'Landscape considerations' template for Valley Park in the February 2014 draft of the Local Plan, but omitted from the Publication version (see Appendix A p.28). This statement (a) was:

*(a) Provide open areas and/or introduce increased vegetation each side of the B4493 to maintain, where possible, a sense of openness along this road.*

This should be re-instated, but with stronger wording (b) like that proposed by KHR in comments on the February 2014 draft:

*(b) An open area resembling the current countryside should extend at least 200m on both the north and south sides of the B4493 to maintain a sense of rural landscape along this road and to preserve a rural gap between Harwell and Didcot.*

The Plan must be modified to do, or have the same effect as doing, the following:

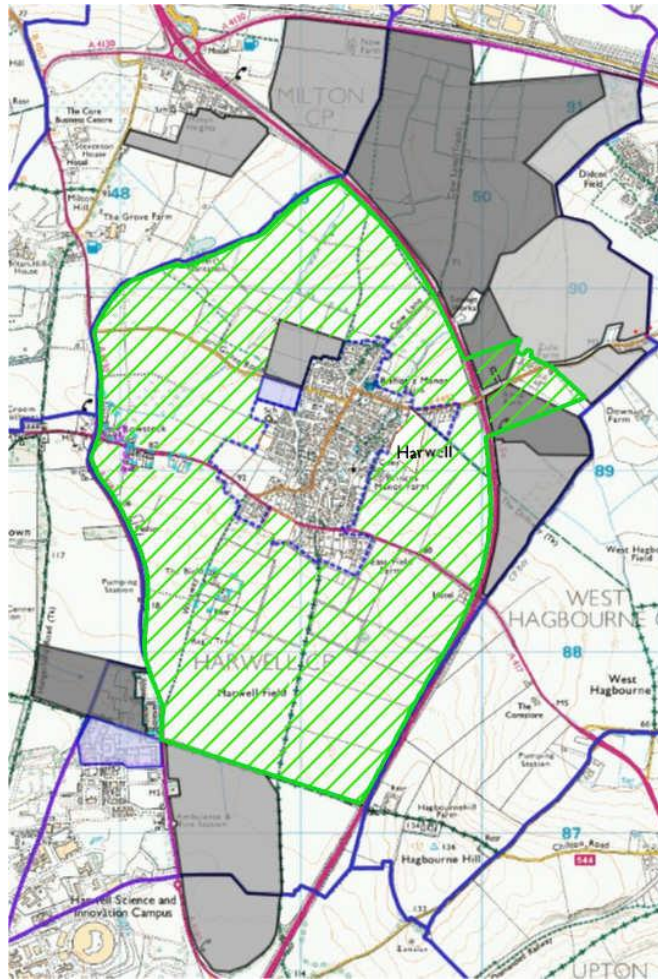
- 1. Incorporate the rural gap area shown on Fig 1 into Saved Policy NE10, thus defining an area where development will not be permitted;**
- 2. Re-instate in Appendix A for Valley Park the intention to provide an open green corridor along the B4493 as in the statement (b) above;**
- 3. Refer to the (revised) Saved Policy NE10 in Section 5.57 and in Core Policy 44 of the Plan.**

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<sup>1</sup> See <http://edrms.bedford.gov.uk/OpenDocument.aspx?id=20ZDDprsHXZ1W7QI5noNVw%3d%3d&name=Allocations%20and%20Designations%20Local%20Plan%202013%20INTERACTIVE.pdf>

<sup>2</sup> See [www.eaststaffsbc.gov.uk/filedepot\\_download/51226/520](http://www.eaststaffsbc.gov.uk/filedepot_download/51226/520)

Fig.1



7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

**No**, I do not wish to participate at the oral examination

☒

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To explain adequately our concerns and represent the views of others in our community.

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

16 Dec. 2014

## Part B – KHR Representation 3

Name or Organisation : **Keep Harwell Rural Campaign**

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy **Core Policy 17** Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please mark as appropriate.

5. 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.

Core Policy 17 (Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area) is unsound because it does not prove that the improvements will be effective at coping with the scale of housing development proposed in the Plan. Specifically:

- a) CP17 states that the package will be further refined through the development of the OCC Local Transport Plan 4 and the Science Vale Area Action Plan. The fact that these are not yet in place shows that further work is in progress which may or may not show that the measures will be effective, or if not, to what degree.
- b) Paragraphs 6.67 – 6.72 on A34 Strategy, leading to Core Policy 34, state that it is likely that by 2030 congestion along the A34 will take place more frequently, including outside peak hours. This is consistent with traffic modelling of development scenarios carried out by OCC which show that at peak times the A34 is constrained by being at full capacity. In our response to the consultation on the VWH Housing Delivery Update of February 2014 we said: “The next version of the Vale Local Plan should include an up to date statement about the steps that the Highways Agency intends to make to enable the A34 to cope”. The fact that an A34 Strategy does not yet exist (because it is still being prepared, para 6.68), shows that there is no certainty that the A34 can in the future ‘function as a major strategic route thereby reducing consequential congestion on the local road network (CP34)’.

6. 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 at 5 above where this relates to soundness.

The Plan must either:

- Provide assurance that the road improvements will be able to cope with the scale of development proposed in the Plan, based on firm evidence from traffic modelling of the actual improvements proposed, including those to the A34;

or:

- Provide a strategy and site priority order for scaling back the amount of housing proposed to a level, justified by traffic modelling, that proves that the road infrastructure will be able to cope.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

**No**, I do not wish to participate at the oral examination

☒

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To explain adequately our concerns and represent the views of others in our community.

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Signature:

Date:

16 Dec. 2014

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## Part B – KHR Representation 4

Name or Organisation : **Keep Harwell Rural Campaign**

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy **Core Policies 4 and 5** Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

*Please mark as appropriate.*

5. 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.

Core Policies 4 and 5 are unsound because they are not sufficiently justified nor will be effective. A separate representation deals with questions about the validity of the SHMA. This representation applies even if the SHMA is judged to be appropriate as a target for the overall housing needs of the Vale of White Horse District. If criticism of the SHMA is upheld and the housing targets are reduced then some of the quantitative elements of this representation can be re-considered.

### **General grounds for our objections**

By dividing the District into three Sub Areas VWH has unnecessarily and unrealistically reduced the flexibility of adjusting the housing provision to meet the evolving needs over the next 15 or more years.

This is exacerbated by the introduction of a further constraint in the form of ring fencing within Science Vale Oxford. The purpose of this is obscure when Science Vale Oxford as depicted in Figure 4.3 is the same as the area of South East Vale depicted in Figure 5.4 apart from the extreme south east corner around Blewbury – in which there are no strategic housing proposals anyway.

Furthermore, if a motivation for these subdivisions is proximity of housing to centres of employment, it fails to recognise the historic and current pattern of habitation in the area, where, for example, Abingdon is just as favoured as a choice of habitation for the largely professional people who work at Harwell and Milton Park as is any village within South East Vale. Indeed places such as Steventon and Drayton (outside South East Vale in 'Abingdon

and Oxford Fringe') are nearer to Harwell and Milton Park than Wantage and Grove that are within South East Vale.

A daily travel to work pattern for 2012 for Milton Park<sup>3</sup> illustrates this, with origins distributed widely over at least a 20 mile radius. This might have many reasons, including shortage of housing or conversely not wanting to live next to the workplace, but it illustrates a complex picture that is unlikely to be radically changed by small differences in housing location.

So whilst these sub divisions may have some arithmetical convenience for the planning process they do not recognise the human dynamics of the areas concerned and by so doing impact on some communities much more than others.

### ***Consequences for Harwell***

Harwell village is especially changed by the proposals in Core Policies 5 and 6: 45% of Parish land that is currently farmland or open countryside will be built over. About 80% of the Parish boundary will have buildings on one or both sides, compared with 20% now. Much of the farmland in question is best and most versatile agricultural land. By 2031 the new developments on Harwell's doorstep would amount to about five existing Harwells.

Specifically the increase in housing numbers stemming from the SHMA has (a) added 1,200 more houses to Valley Park (both sections) that already impinges on the rural gap between Harwell and Didcot; (b) caused VWH to add 850 houses at East of Harwell Campus on the North Wessex AONB; (c) added 550 houses North of Harwell Campus on the North Wessex AONB and (d) added 200 houses West of Harwell. All of these will have an undesirable impact on the countryside areas in question.

Paragraph 116 of the NPPF states that planning permission for major development in the AONB should be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest (paragraph 5.61). In paragraph 5.62 VWH cites the benefits of proximity to the Harwell Campus as the 'exceptional circumstances'. Whilst this may arguably have some validity for (c), which adjoins existing housing, it fails to recognise the open countryside nature of (b), with its amenity value to local residents, and given the habitation patterns of local workforces overestimates the importance of extreme proximity to place of work. (d) is a site with limited access and connectivity to the rest of Harwell Village and its template in Appendix A p.33 does not recognise the extent of improvements to Grove Road that would be needed.

We therefore oppose (b) and (d) and would seek to reduce the total housing figure (a) for Valley Park from 3,350 towards its original figure of 2,150.

### ***Potential Solutions***

The options for modifying the Plan to meet these objections are limited, but do exist. Core Policies 4 and 5 are unsound because not only have they divided VWH into sub-areas across which no flexibility is allowed, but also because they have ignored some options for strategic housing allocations. Examples are given below.

In its background documents VWH has considered and rejected the proposal known as 'Oxford Garden City', which would site 12,000 – 15,000 houses between East Hanney and Steventon. It has not considered any options for siting some fraction of this number in that area, and even the SHLAAs for Drayton, Steventon and East Hanney only examined three small areas near Steventon and East Hanney with potential for at most 165 houses.

It is unsound to consider this area for the whole of Oxford Garden City, including its avoidance or mitigation of flood zones, and then by rejecting that option fail to consider any other options for the area. Some of the area between East Hanney and Steventon is safeguarded by Core Policy 14 for a possible Upper Thames Reservoir (see also Appendix F). However, this may not be needed beyond 2019 and also may not preclude the availability

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<sup>3</sup> Fig 6-1 in SQW Report *The Oxfordshire Innovation Engine*, October 2013.

of some potential sites. The associated uncertainty could though be taken into account in the Plan by keeping the additional housing of (a), (b) and (d) as reserves for the later part of the Plan period, against the also uncertain achievement of the large forecast growth in employment in Science Vale Oxford.

Another alternative housing site left unexplored in the Plan is the land at Didcot A Power Station site. Core Policy 16 implies some possible use for 'residential' and the land areas would suggest that up to about 20 ha could be available other than the 29 ha reserved for employment uses. This could accommodate up to about 400 houses.

Furthermore, the option of using housing locations around Didcot in SODC in order to reduce the need to develop on the AONB and to limit coalescence of Didcot and Harwell could be considered under the 'duty to cooperate'.

6. 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 at 5 above where this relates to soundness.

1. Abolish artificial sub-divisions of VWH.
2. Delete 850 houses at East of Harwell Campus on the North Wessex AONB.
3. Reduce the scale of Valley Park with North West Valley Park from 3,350 towards the figure of 2,150 that applied before the increase of 1,200 stemming from the SHMA.
4. Delete 200 houses West of Harwell.
5. Review alternative sites in VWH and SODC that could accommodate these changes.
6. If this review cannot find alternative sites, reduce 850 houses at East of Harwell Campus, 1,200 houses at Valley Park (both sections) and 200 houses at West of Harwell to 'reserve' status in the Local Plan, to be built only if the employment numbers on which the SHMA is based are realised in practice after ca. 2025.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

☐

**No**, I do not wish to participate at the oral examination

☒

**Yes**, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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Signature:

[Redacted Signature]

Date:

16 Dec. 2014