



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 no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

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		
First Name	David	
Last Name	Marsh	
Job Title (where relevant)	Chairman	
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Part B

Representation 1 - SHMA

Policy

Core Policy 4 Meeting Our Housing Needs
& all others that flow from it, in particular, **Core Policies 8, 15 & 20**

Legally Compliant

Yes

Sound (Positively Prepared, Effective and Justified)

No

DtC Compliant

Yes

why unsound

Plan is based on exceptionally high forecast of housing need as defined in the controversial Oxfordshire SHMA and supporting evidence base.

The SHMA is based on a series of questionable assumptions which add up to a total employment forecast which lacks credibility. This employment forecast in turn drives the housing need forecast.

Despite being a statement of need, and not a target, the Vale has accepted this number without scrutiny or challenge.

More evidence is provided in the critique commissioned by CPRE Oxfordshire from a leading planning expert who concluded that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.

- 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; and
- 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. However much of this figure seems itself just to be based on questionable hopes of aggressive economic growth and house building rates and it has not been subject to public consultation or independent scrutiny.

The SHMA itself says it is just a starting point and only part of the evidence base for determining housing need and that further work needs to be done to test whether it can be accommodated sustainably before adopting it as a housing target. The Vale did not attempt to undertake any further work before adopting the SHMA figures unquestioningly; it should first have assessed them against social, environmental and infrastructure considerations.

By the time the Vale plan is inspected, the Cherwell plan will have been reviewed, and Oxfordshire SHMA accepted as an appropriate statement of need and hence setting the district housing target, or it will have been rejected.

modification(s) necessary

If the Oxfordshire SHMA is rejected by the Cherwell inspector, then the Vale should withdraw its plan and modify it line with the Cherwell inspector comments.

The SHMA should be reviewed and a revised statement of needs derived, based on Government's official household projections and more credible and realistic employment projections. .

Participation **Yes**, Harwell Parish Council wishes to participate at the oral examination. Why

So as to be able to explain the case for the modifications requested

Representation 2 – AONB

Paragraph

5.61 – 5.64.

Policy

Core Policy 15: Spatial Strategy for SE Vale Sub Area

Core Policy 44: Landscape

Appendix A: Site Development Templates

East Harwell Campus (Harwell and Chilton Parishes)

North of Harwell Campus (East Hendred and Harwell Parishes)

Legally Compliant

Yes

Sound (Positively Prepared, Effective and Justified)

No

DtC Compliant

Yes

why unsound

The Vale's uncritical acceptance of the SHMA figures as targets has led to the inappropriate allocation of sites within the Green Belt and North Wessex Downs Area of Outstanding Natural Beauty (AONB). The plan has identified four development sites in the Green Belt to accommodate 1,510 houses, and two in the AONB for a total of 1,400 houses, which is threatening to undermine the rural character of the Vale.

Under the Countryside and Rights of Way Act 2000 the Council has a statutory duty to have regard for the purposes for which the North Wessex Downs were designated an AONB, that is to conserve and enhance the natural beauty of the landscape.

The NPPF (paras 115 and 116) places AONBs in the highest category of landscape protection and affords them "great weight" in the decision-making process. Further to this the NPPF confirms that AONBs are one location where restrictions apply to development and accordingly that: 'Planning permission should be refused for major developments in these designated areas except in **exceptional circumstances and where it can be demonstrated they are in the public interest.**'

There is no evidence to demonstrate exceptional circumstances, or that the allocations in the AONB are in the public interest.

In the various landscape assessments of the AONB sites, there is no evidence of "great weight" being applied to AONB characteristics when evaluating the selection of sites.

modification(s) necessary

Remove the Harwell Campus East site from the plan. (850 houses)

Limit the housing allocation at the north end of the Campus to land within the existing campus, and remove the extension into greenfield land in East Hendred Parish. (275 houses)

It is observed that although the Vale have allocated 3350 houses for Valley Park, the developers have indicated that they will come forward with an application for planning permission for significantly more houses, and hence the PC asks that the inspector reviews the Valley Park allocation in detail and to see if an increase in density is appropriate.

This review could be done in conjunction with the Science Vale Plan Action Plan. If these houses are justified on the basis of employment within Science Vale, then, given that part of Science Vale is in Didcot/SODC, under the duty to co-operate any review of housing allocation should encompass the whole geographic area of Science Vale.

Participation **Yes**, Harwell Parish Council wishes to participate at the oral examination. Why

So as to be able to explain the case for the modifications requested

Representation 3 – Coalescence and the protection of Harwell Village

Paragraph

5.57, 5.81 – 5.84

Policy

Core Policy 44 Landscape

Appendix G. Saved Policy NE10 Urban Fringes and Countryside Gaps

Legally Compliant

Yes

Sound (Positively Prepared, Effective and Justified)

No

DtC Compliant

Yes

why unsound

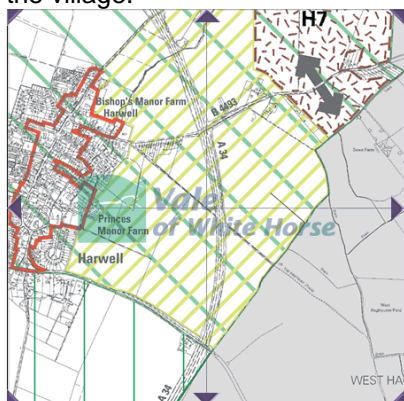
The Plan has no effective mechanisms to deliver the aim stated in 5.57 [blue box] that: “*The countryside and villages will have maintained their distinctive character. The Larger Villages will have retained their separate identities...*”. This aim is ignored in paras 5.81-5.84 which discuss the proximity of Harwell (and other villages) to Didcot

Nor does the Plan have an effective mechanism to deliver CP 44 (ii) for Harwell Village, which sets out to ‘*protect from harmful development ...[the] important landscape settings of settlements*’.

Saved Policy NE10 states

In the urban fringes and important open gaps between settlements, as shown on the proposals map, development or changes of use which would harm their essentially open or rural character will not be permitted.

The saved proposals map shows the whole area of Valley Park, and a buffer area west of the A34 and east of the village.



However this policy is clearly in need of revision because it indicates that no development should take place on the land now allocated to Valley Park.

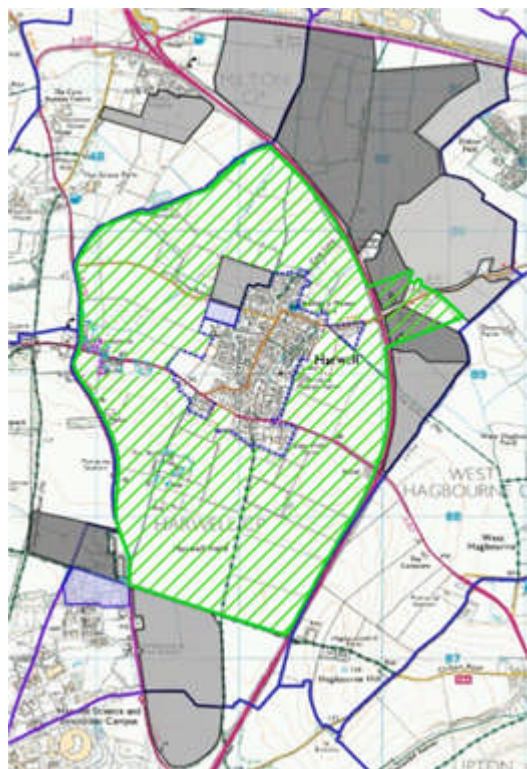
There is nothing specific anywhere in the Plan which defines unambiguously what constitutes ‘maintenance of distinctive character/separate identity for Harwell village’, particularly on its east side with encroachment by Valley Park.

[Note the definition of a Green Wedge is provided in the NPPG: **Green wedges** *comprise the open areas around and between parts of settlements, which maintain the distinction between the countryside and built up areas, prevent the coalescence (merging) of adjacent places and can also provide recreational opportunities.*]

modification(s) necessary

First change

Saved policy NE10 should be updated to reflect the reality of the Valley Park allocation, and the proposals map should be extended to provide protection to Harwell Village. All land in Harwell Parish, north of the Icknield Way, and west of the A34, and outwith the existing Village built up area, should be protected from development within the meaning of saved policy NE10.



Second Change

Additionally, to mitigate against the coalescence of Harwell Village with Valley Park, a green wedge should be introduced east of the A34, with land excised from the Site Allocation.

Hence, in the **Site Template for Valley Park**, Landscape considerations, (Plan appendices, page 28) extend the existing bullet with new words (bold below)

The boundary between the development areas and Harwell village must be carefully treated in order to protect the separate identities of Valley Park and Harwell, **and a green wedge must be provided on both sides of the B4493 until the edge of the Great Western Park development, and no housing should be provided in this area.**

Participation **Yes**, Harwell Parish Council wishes to participate at the oral examination. Why

So as to be able to explain the case for the modifications requested

Representation 4 – Harwell West Site Selection

Policy

Core Policy 15

Appendix A, site templates, page 33 West of Harwell 200 houses

Legally Compliant

Sound (Positively Prepared, Effective and Justified)

DtC Compliant

Yes

No

Yes

why unsound

Site template says

Access and highways:

Access can be taken from Grove Road but this and its junction with A4130 will need to be improved (Grove Road has a width restriction).

This statement totally under-estimates the difficulties of access to this site. Grove Road does indeed have a width restriction because it is a narrow road along its entire length.

Road widening will be needed for the entire length of the Grove Road between the village and the B4130 (1.25km).

In the 50 metres or so before its junction with Harwell High Street, Grove Road is constrained in width by listed buildings on each side, and is already too narrow for pedestrians to use. A complete redesign of this junction will be needed to consider enhancements such as a one-way system or traffic lights.

These developments are expensive and do not appear to have been factored into the viability assessments for this site, hence rendering this allocation unsound.

modification(s) necessary

Remove the site allocation from the Plan, noting the same comments made with respect to the Harwell Campus east site, that the capacity of Valley Park allocation should be reviewed.

Or, if the site remains in the plan:

Appendix A, site templates, page 33.

Change

Access can be taken from Grove Road but this and its junction with A4130 will need to be improved (Grove Road has a width restriction).

To

*Access can be taken from Grove Road but this, **its junction at the Village High Street and its junction with A4130 will need to be improved (Grove Road has a width restriction and inadequate pedestrian provision, especially within the village).***

Participation **Yes**, Harwell Parish Council wishes to participate at the oral examination. Why

So as to be able to explain the case for the modifications requested

Representation 5 – Review Process

Policy

Core Policy 6: Meeting Business and Employment Needs

Core Policy 47: Delivery and Contingency

Appendix H: Monitoring Framework

If the Local Plan 2031 policies are not delivered in accordance with the monitoring framework set out in Appendix G the contingency measures identified in the monitoring framework will apply. If the Authority's Monitoring Report shows that allocated development sites and/or development to be brought forward through neighbourhood plans are not coming forward in a timely manner, the Council will consider:

- i. seeking alternative sources of funding if a lack of infrastructure is delaying development, to bring delivery back on track*
- ii. investigate mechanisms to accelerate delivery on other permitted or allocated sites*
- iii. identifying alternative deliverable site(s) that are in general accordance with the Spatial Strategy of this plan, through the Local Plan 2031 Part 2 or another appropriate mechanism; and if required*
- iv. through a full or partial review of the Local Plan 2031.*

[Note: The monitoring framework is actually Appendix H, not G as reference in CP47]

Legally Compliant

Yes

Sound (Positively Prepared, Effective and Justified)

No

DtC Compliant

Yes

why unsound

The policy relates only to the contingency of **not enough land coming forward** to meet the housing needs, and the possibility of allocating additional sites.

There is no contingency or monitoring check for a **slow down in build rate**. Sites may be allocated and have permissions, but if the developer is not building the 5-year housing supply will be under threat

The only contingency outlined for action is the **number of jobs** where “satisfactory” progress should be made by the end of the first five year, and if not the action is to bring forward employment development

Successive governments have failed to magic jobs out of nothing. The worry here is that between now and 2031 there's a good chance of another recession, or maybe a new government pulls out of Europe and all the Space jobs on the Campus go somewhere else.

The Vale will then be left with half-finished estates, in the most damaging* sites, providing dormitory accommodation for people who work elsewhere.

[* damaging in the sense of impact on the landscape and the environment]

modification(s) necessary

Revise the monitoring framework, to provide additional checks (every two years?)

- a) if there is a slow down in build rates, or
- b) if there is a downward change to the employment forecasts in the SHMA and the supporting evidence base, and hence to provide for a reduction in housing allocations and the removal of strategic sites.

Participation **Yes**, Harwell Parish Council wishes to participate at the oral examination. Why

So as to be able to explain the case for the modifications requested

Representation 6 Infrastructure

Policy

Core Policy 7: Providing Supporting Infrastructure and Services

Core Policy 17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area

Core Policy 34: A34 Strategy

Legally Compliant

Yes

Sound (Positively Prepared, Effective and Justified)

No

DtC Compliant

Yes

why unsound

Roads – county wide

To quote from the Oxfordshire Local Economic Partnership's SEP

'Oxfordshire currently suffers from capacity issues exacerbated by in-commuting. These in turn create constraints to economic productivity and growth in the county. The A34 and A40, in the heart of Oxfordshire, suffer from poor journey times that will prove a significant constraint as the economy grows. The delays caused by congestion are a cost borne by businesses and can lead to less productive employees. These (and other) capacity restrictions limit business efficiency and investment, and the ability for communities to access the full range of services....The A34 is at capacity and suffers from severe journey time reliability problems which in turn cause major delays to users....Businesses cite the A34 and A40 as having a significant impact on business and it is identified as the key piece of infrastructure restricting innovative growth.'

Roads – local

The A417 passes right through Harwell Village, with 10% of its houses having entrances directly or indirectly into the highway. Although the modelling doesn't specifically cover the stretch within the village, there is no reason to believe that the road here will not also be operating at or above operational capacity.

The Plan Evidence Base, specifically the **Evaluation of Transport Impacts Report 2014** when evaluating traffic forecasts for the Local Plan Publication Version (ETI Stage 5) summarises key highway issues (7.3.19 page 37):

- A34 operating at or above operational capacity in both directions between Milton and Botley in the morning and evening peak.
- A417 operating at or above operational capacity between Wantage and Featherbed Lane in the morning peak and in the other direction in the evening peak.
- A420 operating at or above operational capacity in both directions near Buckland and in short sections near Cumnor and Fyfield in the morning and evening peaks.
- A415 operating at or above operational capacity between Kingston Bagpuize and Frilford, with particular problems at the Frilford junctions with the A338 and between Marcham and the A34.
- A4130 operating at capacity approaching Milton Interchange.

The study then looks at possible mitigating scenarios, but still concludes

In summary, it can be seen that the main east-west and north-south corridors across the Vale have instances where sections of the routes are forecast to be operating at or above operational capacity.

Para 7.7.3. and 7.7.16 conclude

In the morning peak the A417 is forecast to be operating at or above operational capacity in the eastbound direction between Wantage and Featherbed Lane. In the evening peak the A417 is operating at or above operation capacity in the westbound direction between Featherbed Lane and Wantage. Delays are forecast to be in the order of ten minutes along this five mile route. The A417 Corridor Study is currently being progressed in discussion with the Parish Councils along its route. It will investigate these issues and it is expected that the public transport and smarter choices strategy will at least increase the people moving capacity of this corridor.

Continued...

Vale Local Plan Part 1. Harwell Parish Council representations

Rail

There is already inadequate rail services for commuting to the London area. One of the reasons for imposing growth on the County is to meet growth pressures spilling out from London so it will inevitably increase pressure to commute back into London and Heathrow. The lack of a station for Wantage does not help as Didcot parking is virtually at capacity, is rationed by price and access difficulties, and is putting pressure on parking elsewhere in the town (in South Oxfordshire District),

Additional train services, additional stations, additional parking, additional connecting services, by bus or tram, are, in many case aspirational, or, if planned, they are years away, so growth as envisaged by the Plan is unsustainable.

Hospitals

No traffic modelling appears to have been done to demonstrate that all residents of the Vale, including all those in the proposed housing will have appropriate and timely access to hospitals. This ranges from public transport access for those without cars to rapid access within the "golden hour" for emergencies such as heart attacks.

Services

New developments, and existing communities, complain of lack of broadband.

Thames Water cannot cope with the sewage discharge from Great Western Park. Additional sewage capacity is needed for new developments in Harwell, and already the main village sewer is at capacity

Although the specifics are possibly outside the inspector's remit, they add up to a challenge to the soundness of the plan and the sustainability of the proposed allocations.

modification(s) necessary

Reduce the housing allocations to a level where the committed and funded infrastructure can be demonstrated to operate appropriately, and there are not significant sections of the infrastructure (of all types, not just roads) operating at or above operational capacity

Participation **Yes**, Harwell Parish Council wishes to participate at the oral examination. Why

So as to be able to explain the case for the modifications requested