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Planning Policy
Vale of White Horse District Council
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27th March 2019

Dear Mr Reed

VALE OF WHITE HORSE LOCAL PLAN 2031 PART 2 (LLP2): MAIN MODIFICATIONS

On behalf of the Harwell Campus Partnership (“the Partnership”), the NDA and Magnox we write in response to your invitation to comment on your Proposed Draft Main Modifications to the Vale Local Plan 3031 Part 2.

As you will have noted from the Harwell Campus Partnership’s submissions to the Vale LLP2 Examination, the Harwell Campus is an important UK Knowledge Economy cluster that is also designated as an Enterprise Zone, a key part of the Government’s pro-growth agenda. The continued success of Harwell Campus is essential to deliver Enterprise Zone benefits and economic growth in both the local area, the region and nationally.

As indicated above, in addition to comments submitted on behalf of the Partnership, this letter also incorporates comments reflecting the concerns of the NDA and Magnox who are responsible for decommissioning and remediation (including waste management and, where appropriate, land remediation) on the licensed part of the Harwell Campus.

Housing

The Partnership has seen your interim conclusions on the draft Local Plan, in which you state simply that the proposed housing allocation at Harwell “*is not justified on the available evidence*”. The Council and the Partnership worked hard to produce evidence that both parties thought was sufficient to show that there were *exceptional circumstances* sufficient to justify a housing allocation ‘tailored’ to meet the particular needs

of the Campus, and to show that, based on the local, regional, national and international importance of the Campus, the allocation was also in the public interest.

It is clearly inappropriate to repeat the Council's case or the Partnership's case in this submission. The Partnership would however draw your attention to the Oxfordshire Local Enterprise Partnership's emerging Industrial Strategy, the working draft of which was submitted to Government in December 2018, after last year's Vale Local Plan Part 2 Examination Hearing sessions. A copy of the full *Oxfordshire Industrial Strategy – Working Draft for Discussion with Government* (December 2018) is attached and the Partnership would draw your particular attention to the *Vision for Oxfordshire* and the section on Oxfordshire's *Capacity for Innovation* and the list of innovation assets, most of which are located at Harwell.

With regard to the new Draft Proposed Main Modifications to Core Policy 15b – Harwell Campus Comprehensive Development Framework – and the supporting text, there is a need to ensure that the new draft policy can accommodate appropriate housing delivered inside the Campus itself to meet any properly justified needs of those working or visiting the Campus, and to support the growth of the Campus. The Partnership has suggested some additional wording (see attached amended policy wording) to the policy that will make it clear that, if appropriate evidence of a need for housing is produced, then it may be possible for the Council to permit housing if it is controlled and will be held, in the long term, for Campus related use. It may help to further explain the Partnership's position.

Harwell Campus employs approximately 5,500 people in over 225 organisations undertaking vital research and innovation in a unique community of scientists, engineers and entrepreneurs. Harwell Campus is of importance to the national economy. Furthermore, Campus jobs support the local economy, and provide exceptional opportunities for professional and academic training and development.

The growth of Harwell Campus has provided a wealth of opportunities for the local area, and as recognised by the emerging Local Plan, is intended to be a significant driver of growth over the Local Plan period. This will provide essential jobs, facilities and Business Rates income for the Vale of White Horse, as well as the wider area.

A key part of the UK Government ambition for the Harwell Campus is to establish a more powerful and complete community of scientists and technologists, to network, innovate and cross- a residential element to support the employment focus. There are four potential components to the need for accommodation.

First, the Partnership is acutely aware that the lack of suitable, and suitably priced, housing in the local area is limiting its potential for growth (see the *Oxfordshire as a Place* section of the emerging Industrial Strategy. Some decades ago, the Government's successful modus operandi at Harwell involved hundreds of homes being built and made available to Harwell's working population for rent, both on Campus and in the nearby towns of Didcot, Wantage and Abingdon. Today, with Harwell located in one of the most expensive parts of the country outside of London, and in particular employing recent graduates and post-doctoral students, affordable accommodation is sought again by both employers and employees.

Second, traditional tenancies or house purchases may not meet the needs of many international employees outside of the student and recent graduate group, who often live and work at the Campus for shorter periods before moving on.

Third, the Harwell Campus expects that a substantial number of existing and future employees of at all stages in their careers will choose a campus lifestyle, walking or cycling to work, and enjoying the facilities provided on the Campus rather than undertaking a long commute by car. The Harwell Campus and the Vale

of White Horse both recognise the sustainability benefits of co-locating employment and housing to reduce travel. This recognition accords with NPPF and broader Government sustainability policy.

Finally, if residents are living on the Campus, not only will they be able to meet and work together more easily, but they will provide a critical mass to support community facilities for those already working at Harwell today, plus those who will live both on and off Campus and in the wider community.

The need for a range of housing has been supported by the Harwell Campus, and accommodation has been requested by current employers and those considering moving to the Harwell Campus, seeking the advantages for their employees and their organisations. The Harwell Campus Partnership believes that the current lack of accommodation is holding back the Harwell Campus; the provision of appropriate housing would address that problem and would support its growth and that of the businesses located there.

The Harwell Campus Partnership respects your conclusion that the need for accommodation has not yet been justified but think that the proposed policy should provide a mechanism that allows housing to come forward if:

- a need can be rigorously justified
- housing is proposed that is tailored to meet that identified need
- a mechanism securing the availability of that housing for the long term is implemented.

The Partnership's view is that the potential impact that the Draft Proposed Main Modifications will have on the Campus's ability to attract and retain scientists and technicians and other support staff, and the impact that this will have on the local economy and the emerging Industrial Strategy' requires careful and detailed consideration. The Partnership's proposed changes to the Draft Proposed Main Modifications would address these concerns.

Decommissioning and Remediation

The NDA and Magnox submitted separate representations in response to the previous stages of the Local Plan consultation process.

Through their representations to the LPP2 thus far, the NDA and Magnox have requested that the Harwell Campus Site allocation within the LPP2 supports the decommissioning and remediation of land within the Harwell licensed site on the basis that post decommissioning and remediation this land can be brought forward for development.

The NDA and Magnox are of the view that it would be helpful if Core Policy 15b could be further amended to acknowledge that the Council supports development required as part of decommissioning and site remediation. Much of this development is considered to be 'Sui Generis' in planning terms and will generate employment opportunities and business activity in the form of decommissioning, before redevelopment for other employment and ancillary uses can be brought forward.

Having regard to the foregoing, the Partnership, NDA and Magnox ask that their proposed changes to modified Policy 15b and its supporting text (attached) are recommended for inclusion as an amendment to the Draft Proposed Main Modifications to the Plan.

Yours sincerely



Steven Sensecall
Partner

