# VALE OF WHITE HORSE LOCAL PLAN 2031 (Part 1 Strategic Sites and Policies) EXAMINATION – STAGE 2

## Matter 9 – Strategy for South East Vale Sub-Area Hearings 2<sup>nd</sup> – 19<sup>th</sup> February 2016

## Statement from the Keep Harwell Rural Campaign (KHR)

Keep Harwell Rural (KHR) is a residents' group independent of any statutory body. It was formed in 1998 to enable residents to express their views about changes that may affect Harwell, in ways that could augment and complement the views expressed by the Harwell Parish Council. KHR has inputs from a cross-section of villagers concerned about education, traffic and road safety, sustainability, the amenities provided by our nearest town, Didcot, and the preservation of the character of a village with a thousand year history.

KHR has responded to planning documents since 1998 and has taken part in Structure Plan and Local Plan Public Enquiries. KHR has also commented in detail during public consultations on other planning matters. (www.keepharwellrural.org)

January 2016

[Note: Q.6.2 is addressed in this Statement since it is included for discussion under Matter 9]

# 9.1 Other than in connection with AONB issues (considered in Matter 6) are the Strategic Housing Allocations listed in policy CP15 soundly based and deliverable?

We have no specific comments on (a), (b), (c), (e), (i) and (j).

(d) If housing on the scale proposed in the Local Plan 2031 is found to be justified, then we cannot argue that Valley Park (site 11) is, as a general location, unsound or undeliverable (although probably not by 2031). However, we have serious concerns about the impact of such a large number of additional houses next to Harwell Village.

The Site Development Template in Appendix A of the Local Plan 2031 Part 1 is inadequate and unsound, particularly in terms of its effectiveness at maintaining the separate identities of Valley Park and Harwell.

In the 'Landscape considerations' template for Valley Park in the February 2014 draft of the Local Plan, <u>but omitted from the Publication version</u> (see its Appendix A p.28) there was a statement:

 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 the stronger wording proposed by KHR in comments on the February 2014 draft:

 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.

This should be part of more general measures to protect Harwell Village from coalescence with the growth of neighbouring settlements, see below after (h).

- (f) East of Harwell Campus (site 13) is on the undeveloped part of the AONB. We contend that discussions under Matter 6 will show that the case for 'exceptional circumstances' for building on this part of the AONB has not been made.
- (g) North-West of Harwell Campus (site 12) is largely on a previously developed area of the AONB and is deliverable, subject to comments that we make under Matter 6.2 below.
- (h) West of Harwell (site 10). This site has limited access and connectivity to the rest of Harwell Village and its Template in Appendix A p.33 of the Local Plan does not recognise the extent of improvements to Grove Road that would be needed. It is the subject of a premature Planning Application that has received numerous objections that have exposed the difficulties of providing satisfactory access and traffic measures. This housing allocation is not therefore soundly based.

General implications of sites 11, 13, 12, 10 and 9. All these sites neighbour the village of Harwell and most include land in Harwell Parish. The Local Plan 2031 includes a Saved Policy

NE10 on *Urban Fringes and Countryside Gaps*<sup>1</sup> that in the proposals map of Local Plan 2011 showed that development will not be permitted in a specific area of farmland and open countryside to the east of Harwell Village. This policy would no longer give specific and effective protection to the separate identity of Harwell Village, because all of this area to the east of the A34 is now earmarked for Valley Park. Furthermore, sites 13, 12, 10 and 9 surround Harwell Village such that its rural character and separate identity from further erosion in <u>all</u> directions is now not protected for the future in the way envisaged by NE10.

The preamble to Policy NE10 in the Local plan 2011 includes the statement: "the areas identified as urban fringe around the western and northern edges of Didcot are considered vulnerable to development pressures. These fringe areas also serve as gaps which help to maintain the separate identities of Didcot and its surrounding village communities and to avoid the coalescence of development in the area in general."

This intent to avoid coalescence of Didcot and its neighbours should still be sustained.

As well as the specific measure that we have covered under 9.1 (d) above, the proposals map for Local Plan 2031 should therefore be made effective by a modification. This should incorporate into Saved Policy NE10 a defined rural gap area where development will not be permitted around Harwell Village. The case for this and a map showing the area proposed are in the Annex.

## 9.2 Are there other sites which would more appropriately meet the identified need for new housing?

Yes, there are other sites, notably Didcot A Power Station Site as in Policy C16 (see also 9.4), which could accommodate ca. 400 houses, sites within the area proposed for Oxford Garden City and rejected *en masse* by VWH without full consideration of smaller sites within that area, and the alternative proposed housing site at Harwell Campus (see also 6.2).

#### 6.2 Would the alternatively proposed housing site at Harwell Campus:

- (i) accord with the exceptional circumstances and public interest tests?
- (ii) more appropriately meet housing needs?

The alternative proposed housing site for 850 houses at Harwell Campus, as in the document dated August 2015 from Kemp & Kemp on behalf of the Harwell Campus Partnership, would be a preferable alternative site to site 13. It would, subject to comments below, be more in accord with exceptional circumstances and public interests tests and would more appropriately meet housing needs.

Kemp & Kemp's Plan KK1 includes Site B, which is on greenfield land. In the context of the totality of proposals for the Harwell Campus we have concerns that Site B and at least part

<sup>&</sup>lt;sup>1</sup> NE10 states that that "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."

of the adjoining Site A (which is earmarked for part of the 550 houses North of Harwell Campus in site 12), involve intrusion into undeveloped parts of the AONB and do not satisfy 'exceptional circumstances'. Site B would account for about 250 houses.

The alternative proposed housing site on Harwell Campus should therefore be included as one of several alternative sites to sites 13 and 10.

9.3 Are the identified and safeguarded Employment sites listed in policy CP15 soundly based and deliverable. Are there other sites which would more appropriately meet the identified need for employment land?

No comments.

### 9.4 Is the policy relating to Didcot A Power Station (CP16) soundly based?

Policy C16 relating to Didcot A Power Station should be revised so that a housing allocation of at least 400 houses is recognised and incorporated into a revision of Policy CP15 (and consequently CP4), replacing site 10 and some of site 13.

#### **Annex**

The proposals map does not reflect the impact of impending planned and speculative development on open land surrounding the village of Harwell and does not adequately protect its rural character and separate identity from further erosion in all directions. As well as being necessary to update Saved Policy NE10, this is relevant to the overall Strategy for the South East Vale Sub-Area and the soundness of the individual sites proposed under Policies CP4 and CP15, because there are deficiencies in the soundness of other sections of the Local Plan 2031. In particular:

- 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....". There is nothing specific anywhere in the Plan which defines unambiguously and objectively what constitutes maintenance of distinctive character/separate identity for Harwell Village.
- The Plan has no effective mechanisms as far as Harwell is concerned to deliver the aim stated in <u>Core Policy 44</u> to protect "important landscape settings of settlements.....important views and visually sensitive skylines...".

To make the Local Plan effective, it must identify a rural gap right around Harwell Village where further 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 Local 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 and 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>2</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>3</sup>

To protect its rural character and separate identify, the rural gap around Harwell Village should be that indicated by the hatched area on Figure 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 Figure 1. Note that the plans for Valley Park extend up to the A34 from the east and Harwell village houses extend almost up the A34 from the west. It is therefore inappropriate and inadequate 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).

Apart from this essential green corridor, the boundaries of the whole hatched area are defined by:

- In other areas on the east, the A34;
- In the west and north, the boundaries of Harwell Parish, which in the west runs along the A4130/A4185. These mark areas of farmland that would traditionally have been regarded as 'Harwell';

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

<sup>&</sup>lt;sup>2</sup> See

<sup>&</sup>lt;sup>3</sup> See www.eaststaffsbc.gov.uk/filedepot\_download/51226/520

• In the south, the Icknield Way. This is at the top of a rise out of Harwell Village, so protecting the slopes up to it would prevent new development on the AONB on these slopes.

Figure 1

