

South Oxfordshire District Council – Local Development Framework

Comments on *Issues and Options* from the Keep Harwell Rural Campaign, January 2008

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 participated in Examinations in Public on the Oxfordshire Structure Plan 2011, the Oxfordshire Structure Plan 2016, and, as a member of the Western Villages Alliance, on the Central Oxfordshire Section of the Draft South East Regional Plan. KHR also participated in the Public Inquiries on the most recent Local Plans for VWH and SODC, including the special Public Inquiry on Didcot in late 2004. KHR has also commented in detail during public consultations on other planning matters.

Harwell is in VWHDC rather than SODC, but SODC policies and practices concerning Didcot and its neighbouring communities impact strongly on our locality. This is particularly so when they involve employment and housing development around Didcot. It is vital that any developments maintain the integrity and rural character of village communities and that the effects of increased traffic are mitigated. Since Didcot is our nearest town we also have an interest in the general provision of infrastructure and facilities. Given our particular concerns we have chosen to comment only on selected parts of the SODC *Issues and Options* document.

General Comments

In general terms the approach SODC is taking towards the spatial distribution of development, such as the balance between towns and villages, is at least giving its constituents a chance to see the thinking behind the issues and opportunities to comment on the balance. We have always maintained the line that brownfield sites should be used to the largest possible extent, and that development in villages, whether large or small, should be confined within existing boundaries. We do though recognise that there is a substantial difficulty in the provision of affordable housing, and therefore would not oppose the consideration of 'exception sites' to provide local affordable housing predicated and supported by villages themselves. Substantial development to the edges of villages would though lead to the destruction of the distinctiveness of communities and exacerbate problems of accessibility to facilities in the towns and in Oxford that are already a problem for many older people.

We therefore support Option 17a on page 52.

Didcot

Keep Harwell Rural remains strongly opposed to the further expansion of Didcot, as evidenced by the submission made by the Western Villages Alliance (WVA, to which KHR belongs) to the South East Plan EiP session on Central Oxfordshire held in February 2007. We therefore disagree with the conclusion in the EiP Inspectors' report that the draft SE Plan's approach to Didcot is 'generally sound' (EiP report summary, p.337) and are disappointed that the report is 'largely supportive of this growth at Didcot' (EiP report para 22.77).

Taking the 'draft South East Plan' referred to in the Options box on page 19 of *Issues and Options* to be the one considered at the EiP last year, we therefore would not support any of the listed options. We could support Option 1a if, as WVA proposed in its submission, housing numbers were shifted from Didcot to around Oxford city, which is the major source of employment in the area and where the transport infrastructure is far better.

The Inspectors did support the case that more housing should be centred on Oxford, as advocated by a number of EiP participants including Didcot Town Council and Oxford City Council as well as WVA, but of course did not reduce housing numbers for Didcot. They have made a specific recommendation for a south Oxford SDA of 4,000 dwellings (EiP report para 22.75). This is being strongly opposed by SODC, and the Council has specifically chosen to exclude it from the options for comment in the *Issues and Options* document (see item 3 on page

13). This seems to us to be reprehensible when it is clearly in play after the Inspectors' report and should therefore be part of the consultation. To exclude it indicates bias on the part of SODC, as it will be hidden from those who concentrate only on the housing options on later pages. For example, people who chose just to look at the section on their particular town could be oblivious to this recommendation of the Inspectors' Report.

We are also very concerned that, if SODC's objections were to be successful, the Inspectors' recommendation for increased overall housing numbers will apply even more pressure on other parts of the district, particularly Didcot and more specifically the villages and parishes around it (since Didcot itself lacks space for extensive development).

We therefore consider it essential that SODC undertakes explicitly to oppose any further increase in the total housing numbers associated with the expansion of Didcot (i.e. the sum of housing numbers at Didcot allocated to SODC and VWHDC), even if it is successful in its opposition to development south of Oxford.

The Inspectors' recommendations are for 4,500 extra houses for Didcot by 2026 over and above those previously planned to 2016 in the Oxfordshire Structure Plan 2016 and hence in extant Local Plans. The 4,500 figure is divided into 2,250 in VWH and 2,250 in SODC. We are puzzled that Map 4 gives a lower figure of 2,100 in SODC for Didcot from 2006 to 2026 beyond those allocated in Local Plans etc already (which apparently would make the total 4,350).

In our response to the VWHDC *Issues and Options* document we have explained why the 2,250 figure for VWH itself gives us great cause for concern, since the only area available to VWH for housing associated with Didcot is an area in Harwell Parish bounded by the VWH boundary to the south, the Great Western Park (GWP) boundary to the east, the A4130 to the north, and the A34 to the west. This area covers 190.76ha north of the B4493 between Harwell and Didcot (which is 39.36% BMV land), and 42.38ha south of the B4493 (which is 98.41% BMV land)¹. If 2,250 houses were accommodated at the same density as planned for GWP (which covers 180ha) the area needed is about 130ha, so it is clear that if 2,250 houses are to be built in VWH, and allowing for land used for any new roads, a good deal of the remaining gap between Didcot and Harwell will vanish. VWH will have failed to adhere to its bedrock policies from recent Local Plans, which have protected important gaps of open land between settlements and not permitted developments which change the essentially open or rural character of an area. We can also cite the GWP Design Statement Document that promises: 'There is also a need to constrain the development visually and physically to reinforce the separateness of Didcot from neighbouring settlements of West Hagbourne and Harwell'. It seems that SODC and VWH are about to give planning approval to GWP, and hence recognise this promise, at the same time as planning to violate it afterwards.

The distinctiveness of Harwell will disappear if this amount of development is permitted. It has been argued in the past, not least by villages to the north and east of Didcot, that the A34 represents a barrier that protects the village of Harwell from encroachment. This is a fatuous argument, as would be realised by anyone standing on the bridge over the A34 to the east of Harwell if they closed their eyes and imagined 'Didcot' starting on the east side of the bridge (even if they ignored the noise). Harwell housing already extends up to and beyond the A34 bridge, so there would be a continuous built environment starting east of Rowstock and extending to the eastern boundary of Didcot. Harwell would have become a suburb of Didcot.

In evidence to consultations and inquiries over the last decade we have also made representations concerning the possible risks to human health from traffic-generated carbon soot particulates (PM10s) and polycyclic aromatic hydrocarbons (PAHs) if major development takes place close to and downwind from the A34. These representations were made in response to proposals for GWP, particularly highlighting the fact that virtually no reliable and relevant experimental data exist for levels of these pollutants actually on the GWP site. Building yet more houses to the west of Didcot would increase any such risks considerably and should not even be contemplated before comprehensive measurements of pollutant levels are made over a period of time long enough to cover all weather and seasonal variations, and used to assess the risks using the latest standards.

¹ Figures from N Burroughs of VWHDC, 30 November 2007.

GWP will already extend Didcot to the west, whereas its heart, with the development of the Orchard Centre, has shifted to the east. This imbalance will be made worse if there is more expansion to the west.

The consequences of SODC and VWHDC agreeing that VWH should contribute 2,250 houses to the expansion of Didcot are thus dire:

- The distinctiveness of Harwell village will disappear;
- More BMV land will be irreversibly lost to add to that already sacrificed by agreeing to GWP, at a time when global warming and attendant sea-level rises threaten the large fraction of the UK's BMV land near the east coast, making inland BMV land a more precious resource;
- Building near to the A34 carries greater risks of noise and pollution than alternatives.
- Didcot will become an even more unbalanced town.

We therefore object strongly to the current housing plans for Didcot to 2016 and contend that, if the total figures have to be maintained, the SODC share has to rise from the cited figure of 2,100 to about 4,000, with the VWH figure falling to a minimal level. Although in the event SODC may be able to accommodate some of its allocation within the built-up area of Didcot, past evidence suggests that a very high fraction of new development will have to be on greenfield land.

In terms of location, Map 5 and corresponding information in the VWHDC *Issues and Options* document show just how constrained the options for development around Didcot actually are, taking into account such things as the existence of AONBs, BMV agricultural land and areas deemed to have flood risk. Delays in approvals for Ladygrove East and Great Western Park also question the deliverability of housing on this scale and timescale.

Whatever further greenfield development is allocated should however now be limited largely to the general area north east of Didcot. SODC has available to it the site north east of Didcot that was originally the preferred site for accommodating 3,200 houses by 2011. The arguments that caused the EiP Inspector in 2000 to recommend it over Didcot West remain valid. In particular even greater priority should now be given to the protection of BMV land given the national resource it represents in the face of threats from climate change. The north east sector is almost entirely Grade 3b and hence its use for development is preferable to other areas that include significant fractions of BMV land.

The western part of the north east site does now include an area classified as Zones 2/3 for flood risk, but our understanding is that the nature of this assessed risk is overflow from local brooks, culverts and ditches that could relatively easily be resolved through standard engineering and drainage measures. Building on the north east site was if anything less of a threat to the distinctiveness of nearby villages than GWP now is to Harwell and the Hagbournes. We note that Area A on Map 5 now extends to the east of the B4016, so a majority, if not all, of the new housing required for Didcot should be capable of being accommodated by Area A and parts of Areas B and C that are outside the AONB.

We consider that the issues are more complex than implied by a simplistic answer to 'Option 10' on page 34 of the document, but (a) SODC should take a much larger fraction of the total housing numbers planned for the further expansion of Didcot and (b) the most favourable directions of growth are Option A and part of Option B followed by the small areas represented by Options C and F. We strongly oppose Options E and D, which would use BMV land and impinge unacceptably on the villages of West and East Hagbourne.

Traffic

The development of GWP alone is predicted to increase peak-time traffic through Harwell village by as much as 50% and in consequence of this the developers will make a contribution towards the cost of a future 'Harwell bypass'. There is of course also a predicted general growth in traffic volumes, which together with GWP and proposed further housing development would double an already high load within the timescale covered by the *Issues and Options* document. Recognising this, the SE Plan EiP Inspectors have stated that '*Key to unlocking subsequent development will be the Harwell bypass*' (EiP report para 22.81). In that same paragraph it is said that 'VWHDC

was confident that funding sources had largely been identified for the Harwell bypass'. We trust that this confidence is justified: examples such as Marcham prove that obtaining funding and getting a bypass are a million miles from 'identifying sources'.

Previous traffic modelling suggests that increases in flows through Harwell caused by development around Didcot are not changed much by exactly where that development occurs. The need for a Harwell bypass is therefore not materially changed by the distribution of the >4,000 houses proposed for Didcot, and if these plans go ahead in any shape or form it is essential that the need recognized by the EiP Inspectors is realized in practice. The key identified by the Inspectors implies action before the extra building. We want to see a requirement that a satisfactory means of bypass is provided before further housing is started.

We are concerned that what is being described is 'the Harwell bypass' rather than 'a means of bypassing Harwell'. A specific route between the B4493 near Zulu Farm and the A417 near the Kingswell Restaurant appears on Map 5, with a possible extension from the B4493 north to the A4130. There seems to be no appreciation that the diversion of traffic from Harwell High Street to the A417 running through the south part of Harwell village may solve one problem and create another. It also appears that a single route may be being cast in tablets of stone without enough reference to the way the whole picture of traffic problems around Didcot and its neighbouring villages may evolve.

We believe very strongly that there is time available to look much more holistically at the traffic implications of the expansion of Didcot and in particular to examine many more options for 'a means of bypassing Harwell' before any firm indication is given of the most effective route. In this context options that follow the route of the A34 (but not necessarily using the A34 road itself) from Milton to beyond Chilton should not be ruled out. We strongly urge SODC and VWHDC to adopt this more open-minded approach to the traffic problems while time is on their side.

Our answer to Question 4 on page 34 is that we support strongly a Harwell bypass rather than the Harwell bypass and consider that it is not possible to answer the other questions until much more work is done.

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