

South Oxfordshire Core Strategy Preferred Options

March 2009 consultation

Comment Form: Preferred Options

Please use this form to tell us what you think of our preferred options document. Before commenting it is important that you take the opportunity to read the Core Strategy Preferred Options report. Where possible we preferred that representations are made electronically, as this is the quickest and easiest way of responding. We will use your comments to help develop the strategy further for the submission stage, where the strategy will be submitted to the Secretary of State in January 2010.

The closing date for this consultation is **1 May 2009**. Please be aware that your comments will be available for people to read and we will be putting a summary of the responses on our website.

Your details

Q1 Name: *Dr A E Hughes*

Q2 ID number (if known):

Q3 Company or organisation name (if applicable):

Q4 If representing a group or body please state their name: *Keep Harwell Rural Campaign*

Q5 Address: *Kingswood, 2 King's Lane, Harwell, Didcot, OX11 0EJ*

Q6 Email address: *a.hughes09@btinternet.com*

Q7 Contact number: *(01235) 835301*

Q8 We would like to include these details in our database, so that we can keep you informed about future information and consultation on our Local Development Framework (planning issues)

If you do not wish us to hold these details please tick this box.....

Your comments

For your representations, we suggest that you separate your comments into the topic areas. Please feel free to comment on any area of the document, as well as the Sustainability Appraisal and supporting documents.

You **do NOT** have to answer every question, please just use them as an aid.

Q9 Please state the specific paragraph number or question number that you are responding to and whether you are supporting or objecting to the proposals. Make your comments below.

Background

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 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.

General Comments

In general we support the overall strategies in the consultation document, although we sense a lack of realism in some of the objectives and plans in the light of the current economic downturn. We are outside SODC, but its plans for Didcot are having and will have a large impact on Harwell and on other surrounding villages. Some of these impacts, such as the rejuvenation of Didcot and the development of its town centre, are very positive and are proving to be of great benefit to Didcot and its environs. They will be essential as Didcot expands in the ways that are already approved out to 2016, most particularly through Great Western Park and Ladygrove East. Whilst we opposed the westward development of Didcot and deplore the way that the original OCC decision and the EiP recommendation to build to the north east were reversed, we always accepted that this phase of Didcot's expansion was inevitable and in many ways, from the town's point of view, desirable. Even this expansion though presents strains on local infrastructure and degradation in the rural identity of nearby villages, and we remain very concerned about the impacts and how existing plans out to 2016 will actually work out in practice. Our comments on this next round of planning to 2026 should be seen in this context.

As most aspects of the SODC document do not impact on our interests we shall only address a very limited number of the specific questions it raises.

Specific Comments, Objections and Proposals

1. The Environment (Section 9)

Q11 Have we missed anything in our preferred environmental strategy?

Yes. Para 2.46 in *Issues and Trends* includes the statement: "Agriculture is the main land use and the maintenance of the rural character is dependent on a viable agricultural industry". However, Section 9 on *The Environment* appears to contain no specific commitment to protect quality agricultural land. Neither is there any reference in Section 10 on *Climate Change* to the impact that this and related worldwide developments might have on the UK's need for indigenous food production. These omissions should be rectified with a reference to paragraph 28 of PPS7 and a strengthening of the wording ".....except where this would be inconsistent with other sustainability considerations" with words such as "these considerations must include the future role that high quality agricultural land, especially in inland areas, might have to play against the threat of climate change and against the vulnerability of a rising population to global instabilities that might affect the UK's ability to maintain the import of food and other essential provisions".

2. Housing proposals for Didcot (Section 13, Paras 13.12 onwards)

The Keep Harwell Rural Campaign has consistently objected to plans for the further development of Didcot to 2026, beyond the now inevitable, if paused, development of Great Western Park. We commented in detail on this score to SODC to its earlier *Issues and Options* paper and will not go over the background again (see **Comments on Issues and Options from the Keep Harwell Rural Campaign, January 2008**). Within our objections we have particularly criticised the division of the proposed new housing figures for Didcot between VWH and SODC, and continue to maintain that SODC should be responsible for a much larger fraction of whatever further growth for Didcot is demanded. We note now, with some extra concern and astonishment, that the figure for the SODC share on greenfield sites to 2026 in the present SODC *Core Strategy Preferred Options* consultation document, beyond current allocations, is 1,880 (1,430 + 450), whereas the VWH figure is 2,300, so the planned SODC share requiring new sites has now fallen below half to 45%.

We urge most strongly that SODC manifests its responsibility for Didcot, especially in view of its actions in proposing an extra 1,500 houses under *Growth Points* in return for infrastructure funding, by taking a much larger fraction of the additional housing in the Draft SE Plan for Didcot to 2026.

In terms of what this would mean quantitatively, we refer to our comments on the Secretary of State's proposed changes to the Draft South East Plan, submitted in October 2008:

"If this change¹ is not accepted, and the total for Didcot remains the same as currently in the Plan (8,750), that the Footnotes of Policy CO3 are amended to:

(2) The figure for South Oxfordshire includes some 7,750 to be located at Didcot

(3) The figure for Vale of White Horse includes 1,000 to be located at Didcot.

In either case adjust the total figures for District Councils in Policy CO3 accordingly".

If we understand the arithmetic correctly, at the time we wrote this (October 2008) (2) and (3) would imply about 4,000 houses in SODC and 500 in VWH by 2026, beyond current allocations to 2016. The figures in the recent VWH and current SODC *Core Strategy Preferred Options* consultation documents (Table 7.4 and Para 13.13 in the SODC case) would give slightly lower figures on new (greenfield) sites totalling 2,300 + 1,430 + 450 = 4180, so our change above would lead to 500 in VWH and 3,680 in SODC requiring new sites.

With these comments we will now address the sub-sections of Question 19.

Q19a Do you agree with our preferred strategy for Didcot?

No. If the SE Plan figures are confirmed, the housing plans to 2026 should accept more housing in SODC and correspondingly less in VWH.

Q19b Do you agree with the location of our preferred housing sites up to 2016?

Yes. We support the use of the north east site Option A.

Q19c Do you support option A+ or option E west?

Option A+ should be used for additional housing beyond the use of Option A. We **object strongly** to any suggestion that Option E west should be developed. Just the fact that it would develop on Grade 2 agricultural land should rule out this option in absolute terms and by comparison with the fact that option A+ is low grade agricultural land. In addition, its negative effects on the gap between Didcot and the Hagbournes, and on the landscape, are highly significant arguments against Option E.

Furthermore we contend that Option A+ could be extended northwards and to some degree westwards to accommodate the additional share of Didcot's expansion that we argue should be in SODC not VWH. In this context, we believe that the developable boundary of Site A should be examined through a detailed flood risk assessment since the flood hazard implied on the western part of the site may be caused by poor capacity of ditches and culverts. If this is the case the flood hazards could be reduced by simply increasing their capacities.

Q19d Have we missed any key issues in Didcot?

Para. 13.8 takes the same figure – 12,000 extra jobs at Harwell Campus and Milton Park – as in the VWH *Core Strategy Preferred Options* document. The scale of expansion assumed within this figure for the Harwell campus is such a large fraction of the existing employment numbers, and of the historical numbers (double), that we question its achievability. At the very least the Plan should examine a range of more realistic scenarios.

We consider that SODC has also missed a number of other key issues in Didcot, which are covered in Sections 3 to 5 below.

3. Provision of Infrastructure to support or cope with Development

We are pleased that this issue gets very serious attention in the document and that studies such as SCOTS have been done and hopefully will be extended as plans unfold. The history of developments in the past does not however give great grounds for optimism, and there should be a commitment in the plan that the guiding principle consistent with the term '*to an agreed timescale*' in the box at Para 12.12 will be the provision of appropriate infrastructure *in advance of the appearance of the problems it is designed to solve*. This does not imply that all infrastructure has to be provided before development starts, but this will be so in some cases.

¹ Our earlier proposed change viz: to reduce the total numbers for Didcot from 2006 – 2026 from 8,750 to 4,250, such that there would be no growth beyond current allocations to 2016.

4. Road improvements to deal with the expansion of Didcot

SCOTS has modelled over 70 scenarios to arrive at the proposed schemes. We are not clear about several aspects of SCOTS, including the sensitivity of its conclusions to initial assumptions, but it is a welcome step forward and we particularly support the conclusion that a by-pass to Harwell must feature amongst the essential improvements. Depending on the combination of schemes chosen, such a by-pass can also provide relief to the village of West Hagbourne.

We do not though consider the proposals to be adequate. Firstly, there must be firm commitment that necessary road improvements will actually be delivered on time. Secondly, there still seems to be no recognition that a link from the B4493 to the A417, by-passing the centre of the village of Harwell, puts the traffic on the A417 which then runs through the southern part of the village of Harwell. So relief in one part of the village becomes stress on another.

There must be a firm not just aspirational commitment in OCC and Local District plans to provide a full by-pass for Harwell, as part of the portfolio of road improvements.

The traffic volumes on the A417 through Harwell must be considered more explicitly as different routes are assessed. The extent to which different routes help the traffic situation in West Hagbourne as well as Harwell should be taken into account.

The possible 'Chilton Link' might help in regard to traffic on the A417 through Harwell, but we have no way of telling as yet. We are also concerned that this link, or an improvement on it, is being rejected prematurely as a result of the statement quoting from SCOTS in Para 13.23. Some link between the A417 and the A4130 near the Harwell Campus must be kept under consideration. However, we think that the route over Hagbourne Hill has disadvantages, including impact on the village of Chilton, compared with possible routes west of the A34 that terminate at the roundabout to the south of the Harwell Campus. We also propose that routes that by-pass Harwell to the north rather than the east should be modelled to examine their potential. The alternative routes that we propose for modelling are shown schematically on the associated map. We should emphasise that the routes shown are only indicative, and that we are not promoting any particular route or routes at this stage. But we are strongly advocating that more alternatives should be considered, included in the options for modelling, and that their merits or demerits should be assessed when there are more data available (including of course their cost and engineering viability).

In summary, the new roads identified in SCOTS have elements that are necessary but not sufficient.

We therefore urge OCC and the District Councils to consider other and additional options and measures before arriving at a definitive plan for road improvements.

5. Integration of Communities

We agree with Harwell Parish Council that that the VWH and SODC LDFs should clarify the identification of new communities associated with the expansion of Didcot, and the responsibility for services including burials, by proposing a formal boundary change, or an administrative arrangement whereby 'Didcot West' residents are unambiguously part of Didcot/SODC.

6. Other Points

Affordable Housing. Under our 'General Comments' we refer to a sense of lack of realism in some of the plans. We note in Section 7 and Para. 2.22 the shortfall in provision of affordable housing, and the strategy of an overall target of 40%.

Under Q8a we cannot really agree with a target of 40% when (i) this target will fail to meet the needs, and (ii) the achievable delivery, based on for example the 30% figure agreed by SODC and VWH for Great Western Park, fails to match the target. In Para 7.42 SODC accepts that meeting the need is unachievable, and there is no obvious solution starting from here, but there is a clear failure of planning in this area that is rather skated over by basing the future on aspiration rather than evidence of past achievement.

Bus Routes. Map 5.1 shows no connections (not even implied local links) between Didcot and the major employment centres near to it, and suggests that Harwell village will only have a rather mysterious connection heading south. Thus under Q5 the map does not fulfil the first aim of the movement strategy.

Greenway. The 'enhanced greenway' shown on Map 13.2 going around the west side of Harwell is absent from the VWH *Core Strategy Preferred Options*. SODC should clarify the status of this proposal.

Map of options for by-pass routes to include in the SCOTS process

(See Section 4 of Specific Comments, Objections and Proposals)

Key:

Blue: Harwell By-pass A4130 to A417 as defined in the Core Strategy and the SCOTS report.

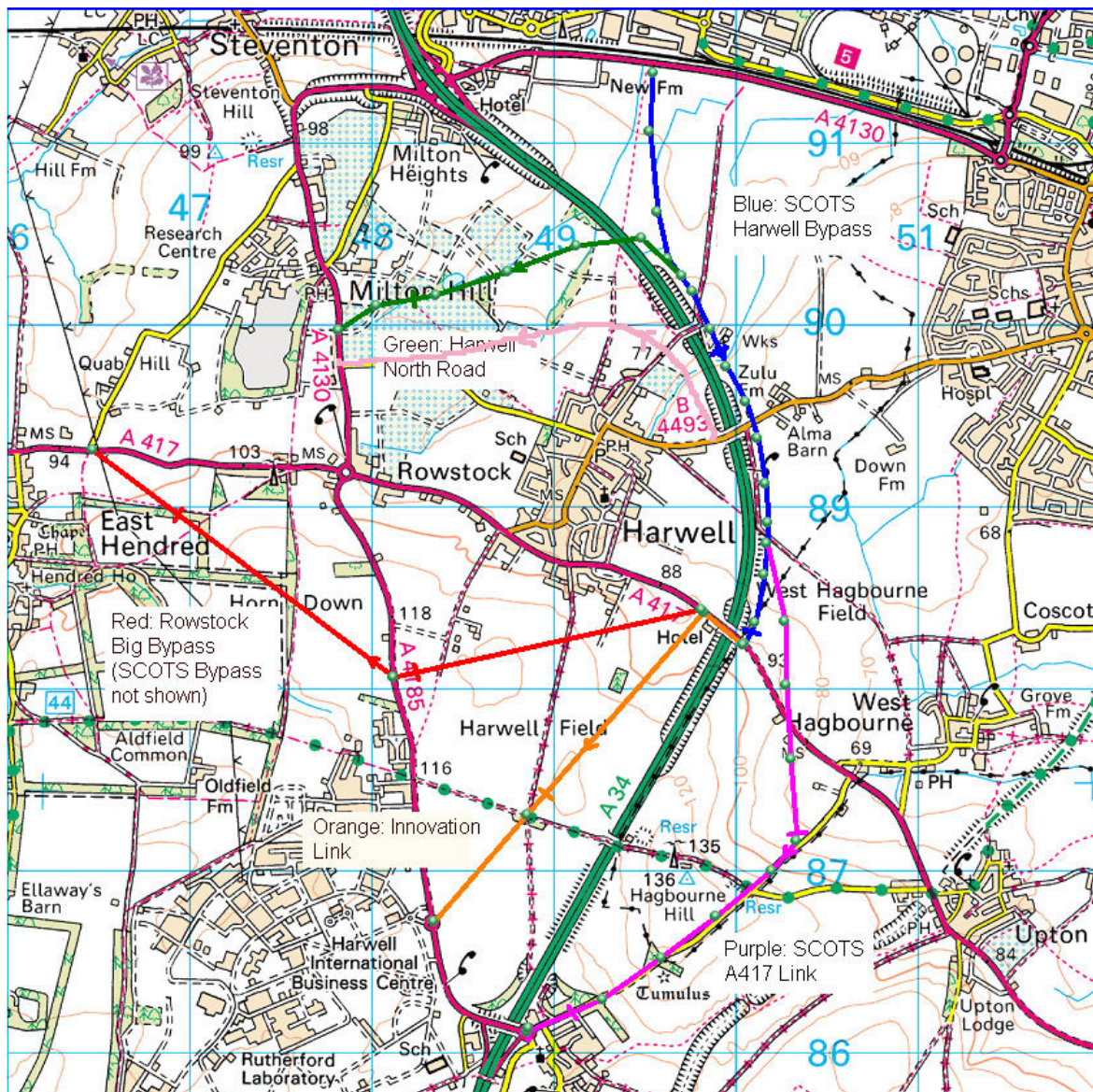
Green: Harwell North Road, linking to the SCOTS Harwell by-pass.

Pink: Alternative Harwell North Road, avoiding the need for a new A34 bridge and the southern section of the Blue by-pass by branching from the B4493 west of the existing A34 bridge and heading north then west to join the A4130 north of Rowstock.

Orange: Southern Extension; A417 to Harwell Innovation Centre.

Purple: Possible A417 Chilton extension via Hagbourne Hill as defined in the SCOTS report.

Red: "Big" Rowstock by-pass.



Accessibility and monitoring

We want to make sure that we are reaching all areas of our community when consulting on these document. Please help us find out if we are doing this by completing the following questions. This data will not be held on our database and only used for monitoring purposes. **NOT RELEVANT AS THIS RESPONSE IS FROM A GROUP**

- Q10** Are you male or female?
Male Female
- Q11** What is your age?
Under 18.....
18 to 24
25 to 35
36 to 44
45 to 60
Over 60
- Q12** Do you have a disability or a long-term health condition that impacts on your day to day activities?
yes
no.....
- Q13** What is your ethnic group?
White
Mixed.....
Asian or Asian British
Black or Black British.....
Chinese.....
Other ethnic group.....

Thank you for submitting your response.

We will use your comments to help plan future development in South Oxfordshire. We will put a summary of comments on our website (www.southoxon.gov.uk/corestrategy)

Please return to: yourplaceyourfuture@southoxon.gov.uk or Planning Policy, South Oxfordshire District Council, Benson Lane, Crowmarsh Gifford, Wallingford, Oxon, OX10 8NJ