

Vale of the White Horse – Local Development Framework

Comments on *Issues and Options* from the Keep Harwell Rural Campaign, December 2007

The Keep Harwell Rural Campaign confines its main comments to Section 3 on the comments form: *Which option or combination of options for locating future development in the Vale do you prefer and why?*

General Comments

The options are clearly not mutually independent. Some are also probably incapable of providing the full scale of development that VWH will be obliged to accommodate by the South East Plan. A simple choice between options A to F is therefore not a very helpful question. It would be more realistic to come to some view about the extent to which each of the options might realistically and desirably contribute to the targets that the South East Plan is likely to present, especially bearing in mind the constraints that those targets include, e.g. specific figures for VWH to contribute to housing at Didcot.

- Option A (within existing towns and villages) and option B (brownfield sites) should be used to the maximum extent that is compatible with planning regulations and taking account of the views of local bodies such as Parish Councils. Neither though is capable of delivering more than a fraction of the housing requirements to 2026, so adopting this view does not eliminate other options.
- We oppose option D (extensions to the edges of villages), other than for ‘exception sites’ to provide local affordable housing predicated and supported by villages themselves. Substantial development to the edges of villages would 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.
- For Harwell the Didcot element of option C amounts to almost the same thing as option D, being distinguished in the end only by the direction from which the development occurs. We return to this below.
- Option E (a new settlement) should be kept in play as a possible component of overall plans, but we recognize the difficulties that have been identified. However, this option could overlap with the use of brownfield sites. The use of the whole or part of Abingdon airfield could create a ‘new settlement’ that actually could be quite well connected with Abingdon. Also, on a smaller scale, the re-creation of a settlement on recovered or even decommissioned parts of the Harwell IBC site could contribute to housing figures without using greenfield land or unduly disrupting neighbouring communities that have coexisted with the site for sixty years.
- We agree that option F (settlements on good transport routes) is effectively covered by the other options.
- Option C (on the edges of the main settlements) is presented as equally ‘take it or leave it’ as the other options. In reality, as paras 26.11 to 26.16 indicate, it basically covers the ‘default’ situation that is very likely to set the parameters for VWH in the SE Plan. The draft SE Plan adopted this policy for Central Oxfordshire and this has been supported by the EiP Inspectors’ report. Our comments are therefore directed mainly at the implications of option C, making representations about how VWH should modify its approach to achieve a better overall result.

Didcot

Keep Harwell Rural remains strongly opposed to the further expansion of Didcot, as evidenced by the submission made by the Western Villages Alliance (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).

The Inspectors did however support the case that we and others made that more housing should be centred on Oxford, and 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 pressure groups to the south east of Oxford and we are greatly concerned that, if these objections are successful, the Inspectors’ recommendation for increased overall housing numbers will apply even more pressure on Didcot, or more particularly the villages and parishes around it.

We therefore urge VWH most strongly to resist any suggestions from anywhere that housing numbers at Didcot should be even higher than those already contemplated in the draft SE Plan and assumed in the

spatial options considered in the LDF consultation. The Inspectors' recommendations imply 4,500 extra houses for Didcot by 2026 over and above those previously planned to 2016 in the Oxfordshire Structure Plan 2016, 2,250 in VWH and 2,250 in SODC.

The 2,250 figure for VWH itself gives us great cause for concern. It is clear from the map on p.33 and from para 26.15 that the only area available to VWH for housing associated with Didcot is the area marked B on the map, 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 on area B, 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 VWH is 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 on area B. It has been argued in the past, not least by villagers 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 on area B 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.

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 VWH accepting to contribute 2,250 houses to the expansion of Didcot are thus dire:

- The distinctiveness of Harwell village will disappear;
- More BMV land will be 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 urge VWH to reduce considerably the 2,250 figure, though a combination of using some of the other viable options cited above and shifting a larger fraction of the Didcot 4,500 to SODC. 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, apart from the existence of an area on its west side now classified as Zone 2 for flood risk. 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. It is obvious that it is a suitable site for substantial development and that building there is preferable to building in VWH on area B. The use of the north east site plus other areas to the east of Didcot, as in the SODC LDF 'Issues and Options' consultation, should

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

be those that mainly contribute to the expansion of Didcot, if it is inevitable. If VWH contemplates any development in area B it should be confined to an extension of the north west boundary of GWP into the triangle of land between the A34 and the A4130, much of which is grade 3b land.

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 of this plan. 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 4,500 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 maps, 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 VWH to press for this more open-minded approach to the traffic problems while time is on its side.