

Vale of the White Horse – Local Development Framework

Comments on VWH LDF *Core Strategy: Preferred Options* from the Keep Harwell Rural Campaign March 2009

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General

We have a number of general concerns about the basis of the emerging LDF Core Strategy. These are covered in Annex 1 so as not to detract from our more specific comments on matters as they affect Harwell and its environs.

Specific Comments, Objections and Proposals

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 have within this objection particularly criticised the VWH's acceptance of half of the proposed figures for Didcot, and continue to maintain that SODC should be responsible for a much larger fraction of any further growth for Didcot¹. We shall not repeat the arguments here, but confirm that it remains our position and that we continue to object fundamentally to VWH's acceptance of such a large fraction of the expansion of Didcot. We refer to our response to the first consultation document of the VWH LDF (**Comments on *Issues and Options* from the Keep Harwell Rural Campaign, December 2007**).

Rather, here we comment on proposals in the current *Core Strategy: Preferred Options* document that are concerned with planning should the housing and other developments around Didcot, and in the 'South Central Oxfordshire' region generally, be inevitable.

1. 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 much greater commitment, as an 'up front' part of the plan, that in the future the guiding principle and the focus of delivery 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. The infrastructure does not refer just to roads,

¹ We note now, with some extra concern and astonishment, that the figure for the SODC share on greenfield sites to 2026 in their emerging *Core Strategy: Preferred Options* consultation document, beyond current allocations, is 1,880 (1,430 + 450), so the planned VWH share has risen above half to 55%.

but also to public transport, cycle and walking routes, healthcare, schools, recreational and other facilities. Indeed the plans and SCOTS, with a focus on roads, currently give too little attention to what might be achieved through more imaginative options for convenient public transport.

2. 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 – the statement that appears in the leaflet “*The Council will require the new roads identified in the draft South Central Oxfordshire Strategy*” has a certainty not evident in the *Core Strategy: Preferred Options* document itself. As it is the LDF rather than a leaflet that will have formal standing this must be rectified. 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 the LDF to provide a 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. Moreover, 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 as far as Harwell is concerned.

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

We note also that SCOTS (see Table 10 of SCOTS Final Report October 2008) predicts large increases of traffic in 2026 compared with 2006 in Drayton, Steventon and Sutton Courtenay and that these increases are mitigated very little by the overall packages of road improvements. This gets hardly

any comment and apparently no solution. This situation should surely be given more attention. We suspect that it comes about because of the way traffic levels on the A34 are constrained, forcing traffic onto local roads. This emphasises one of the deficiencies in local road infrastructure that has been pointed out for years: the one major trunk route connecting conurbations is unable in practice to help with the increasing local traffic.

We also note that the 4-way interchange on the A34 just south of Chilton is just outside the SCOTS area. Use of this junction is a possible route for traffic on the A34 from the north to get to Harwell Campus, with a very short backtrack. Is this possibility included in the traffic modelling? If not, it should be.

SCOTS leaves some issues unanswered; the LDF should not proceed until these issues have been addressed.

3. Rural Gaps

Whatever and wherever housing is planned for the west of Didcot beyond Great Western Park, it will erode further the rural gap between Harwell and Didcot. It seems that the current adopted Local Plan policies H10 and H11 that specifically identify that the land between the settlements of Harwell and Didcot 'must be retained to avoid coalescence of settlements' are to be scrapped. It is inevitable that the proposed housing developments from now until 2026 will remove most of the current physical gap along the B4493, from about 1.25km to 200m or less. However, the perception of a gap is more complex than that, comprising amongst other things the appearance of the development and the gaps that exist away from the road artery. We are concerned that the commitment to a 'green barrier' at the western boundary of Great Western Park may be sacrificed.

VWH should make a renewed commitment to such a 'green barrier', which would be helped by avoiding development on the land near the B4493 to the west of Zulu Farm.

4. Access to the Countryside and Loss of Amenities

The northern part of Great Western Park is already rather 'landlocked' from easy access to the countryside by the A34 and the A4130. Development in the area next to this identified by VWH as a major housing site exacerbates this problem. It also extends over the route of Townsend/Cow Lane that is one of the most used recreation routes for casual walkers from Harwell Village. At present it is possible to cross the A34 on a footbridge and walk all the way to the A4130 through open country. Much of that route would be lost (before the railway came this was the route from Harwell to Sutton Courtenay, named 'Harwell Road' there). Some compensation for this, and improved countryside access for new residents, would be achieved if it were possible to create some public access in the area just west of this, towards the Stert Plantation. Two existing public footpaths penetrate this area, but they are both dead ends, one at the A34.

If VWH persists with plans to put 2,300 houses between Great Western Park and the A34, it should make efforts to open up new countryside access west of the A34 to compensate for the loss of existing amenities.

5. Design of Development West of Didcot

Adding 2,300 houses west of Didcot beyond Great Western Park would be a significant extra 'estate'. If it is going to happen, it should be planned together with GWP, not as an extra.

If VWH persist with plans to put 2,300 houses between Great Western Park and the A34, it should work with SODC to revisit the plans for GWP and have a comprehensive review of the policy for a major development of 5,500 dwellings.

6. Integration of Communities

We agree with Harwell Parish Council that that the LDF 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.

Other Specific Comments on the VWH Document and Answers to Questions

Para 2.4: The second sentence says that the proportion of the population in all three age groups will rise. This is impossible.

Page 13: Footnote 9 ends in mid sentence.

Para 2.52: The population figure for Didcot in 2026 seems low, given that from 2001 to 2026 the plan is for over 8,000 extra dwellings.

Page 26: It will be clear from our comments in Annex 1 that our answer to Question 3 is 'no', and that the vision and objectives are unrealistic.

Para 4.28: Whilst we agree under Question 5, it is with the considerable reservations and criticisms detailed above in our comments. Under Question 6 we do not think that the alternative strategy of allowing more development in the rural areas is a good idea. What we want to see is that any development is concentrated on the 'main settlements' but with complete certainty that the infrastructure to enable these developments is put in place first. We maintain our view that the scale of development planned for Didcot and other similar 'main settlements' puts too much pressure on the existing and likely future infrastructure in what are still basically rural areas and that in the Central Oxfordshire region putting a larger proportion of development near the major employment centres and facilities of Oxford would be more sustainable, particularly in terms of access to frequent public transport.

Para 4.43: Our answer to Question 10 is 'no' because the numbers proposed for the west of Didcot are too high anyway and VWH should re-negotiate the balance of the Didcot figures between VWH and SODC.

Para 4.47: Our answer to Question 13 is 'no' because past and present evidence is that the strategy is undeliverable.

Para 4.49 – 4.51: We do not disagree with Question 15, but the scale of expansion assumed 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.

Para 4.57: Question 21 - It will be clear from our comments above that we regard the Council's approach as a good start, but that much more needs to be done before a satisfactory set of road improvements is achieved. So we do not agree to the highway improvements shown on Figure 4.7.

Para 5.9: Question 24 -for the reasons stated in our response above we think that the policies for the Didcot area are not satisfactory.

Paras 6.6 – 6.8: In answer to Question 29, the approach needs to be strengthened. We note that there is no mention in the embryonic policy 6.6 about timescales and propose that an additional sentence be inserted before the final sentence: ***“The infrastructure concerned must be provided on a timescale such that its benefits are available as soon as the development is functional”***.

Page 70: Questions 30 – 35. We decline to answer these questions because we believe that there are serious deliverability flaws in the whole housing strategy; see paragraph 4 in Annex 1.

Para. 6.54 and Question 38. The Vale’s approach is inconsistent, on the one hand promising protection of natural resources and on the other proposing again to consign some of its best and most versatile agricultural land to development when there were alternatives that could have been more diligently pursued, namely not to have accepted such a large fraction of the extra housing planned for Didcot. Some of this may now be water under the bridge, but that is not a reason to continue the trend. The proposed reference to paragraph 28 of PPS7 should be strengthened with the wording (extra in bold): ***“.....except where this would be inconsistent with other sustainability considerations. 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”***.

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

(See Section 2 of Specific Comments, Objections and Proposals)

Key:

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

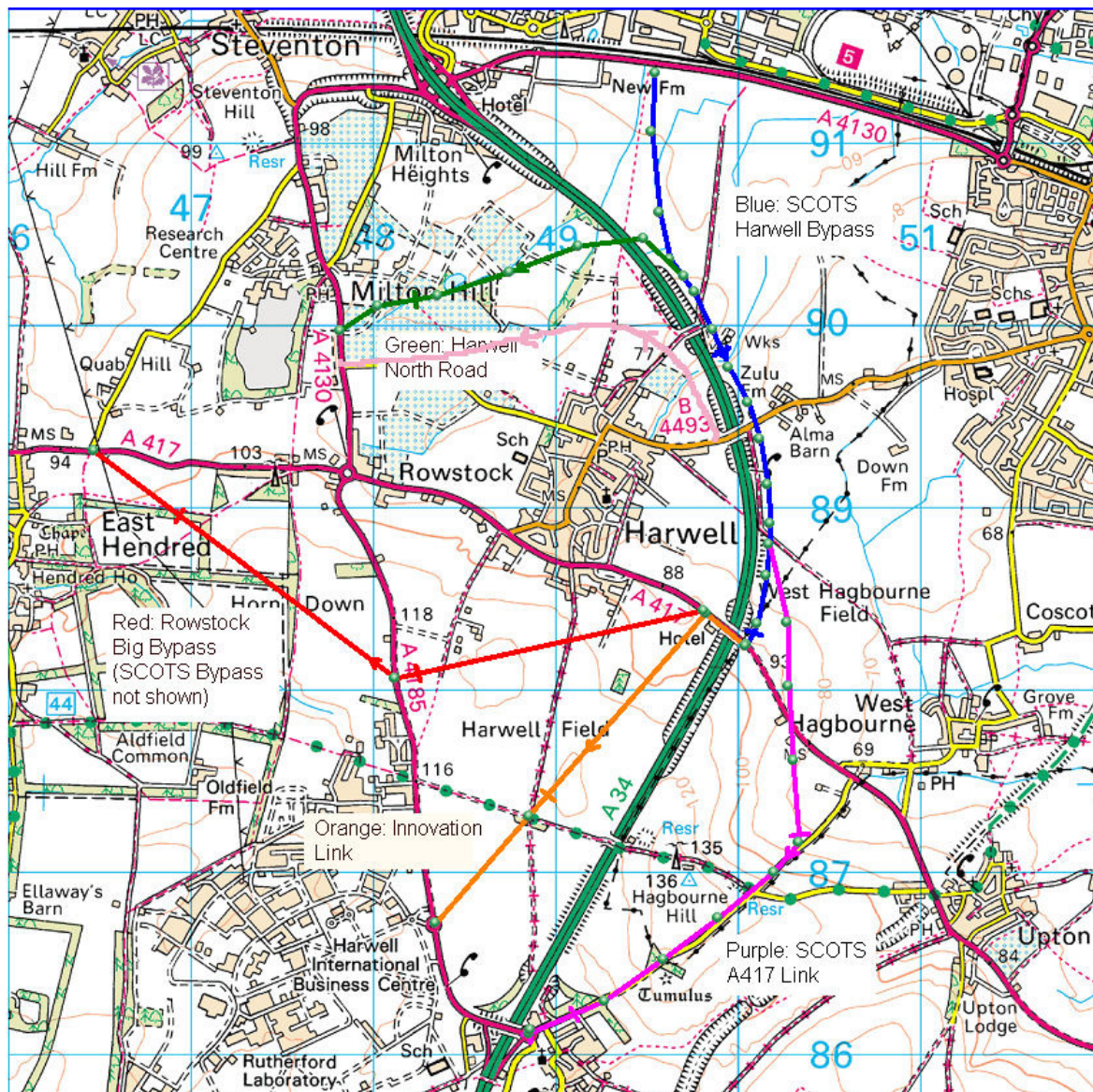
Green: Harwell North Road, linking to the SCOTS Harwell by-pass.

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.



Annex 1: General Concerns about the LDF Core Strategy

1. There is an air of unreality about the plans. We appreciate that VWH is obliged to follow the strategies and plans laid out in the (as yet draft) SE Regional Plan, which creates the same general impression. In particular, both plans very seriously fail to recognise the effects of the economic recession. The recession appeared virtually out of the blue after both plans were fairly well advanced, and even experts (having failed to predict it in the first place) now seem uncertain about its consequences. Since both the SE Regional Plan and the VWH LDF are driven primarily by demographic changes and economic growth, and the linked demand for housing development and improvements in infrastructure, it is blinkered not even to discuss how fundamental assumptions in these plans might be affected by the economic downturn and its duration.
2. The lack of reality can be illustrated by national figures on house building, which show how the planning system relies so much on forecasting that it seems to forget to check up on and take account of what is actually happening in practice. Figures quoted in an article in *The Times* of 20 February imply that in the 2 years 2007-8 around 317,000 houses were completed in the UK, with the RICS estimating that the rate will fall to 80,000 in 2009. If the government hopes to increase the housing supply by 2m between 2007 and 2016 and 3m by 2020 the rate from 2010 onwards has to more than double over what has actually been delivered, and of course the discrepancy gets worse as time goes on. If the system does not make a correcting reality check soon it will be so far adrift as to be totally incredible.
3. There are some strategic issues that the VWH plan glosses over. On its western front the VWH is faced by the expansion of Swindon. Its eastern border has to face up to the focus of presumed employment and housing growth near Didcot. Elsewhere the Vale is constrained by deficiencies in employment prospects to match its largest current housing growth in Wantage/Grove, and severe limitations to any possible development at Abingdon (amongst these being the fact that east of the river in Abingdon is in SODC, and hence seemingly off limits, a factor that does not inhibit SODC where development of Didcot is concerned). The VWH LDF thus presents a future where the traditional heart of the district, in its 'capital' at Abingdon and the market towns of Wantage and Faringdon, is destined for second-class investment compared with Swindon and Didcot. This is already happening as people are drawn to the improving and accessible facilities and shops in Didcot compared with the problems being experienced in Abingdon. Perhaps this is an inevitable change in the shape of the district and one which the unification of the VWH and SODC executives heralds, but it deserves more attention in the plan.
4. A second issue concerns the proposals for housing growth across the Vale. The continuation of the policy of developing the towns rather than distributing development around villages and the rural areas is clearly wise, given that trying to get a modal shift from car use to public transport is a key element of sustainability goals. In Central Oxfordshire this would be most effective through development around Oxford, which has a need for (affordable) housing and has, and will always have, a vastly superior bus network to that in towns such as Abingdon and Didcot. The problem of course is that Oxford is constrained by Green Belt considerations, so the current version of the SE Regional Plan, whilst including substantial (and controversial) proposals for development east of Oxford, persists with substantial growth of county towns including Wantage and Didcot, and hence considerable housing growth figures for the VWH. This leads to predicted figures for

housing delivery rates by VWH that are adequately stated in the plan, but their practical implications are skated over. New housing delivery over the last decade for VWH averages 360 p.a. of which 30% are 'affordable'. Compare this with the forecast build rates in Figures 4.5 and 4.6, which average 560 p.a. for the whole VWH, with peaks up to 900 p.a., and a target of 40% affordable. Then look at the statement in Paragraph 6.13 that more than all of the housing allocated to VWH in the SE Plan would have to be affordable to meet the need. This does not add up: most likely, especially given the recession, total housing numbers will not be delivered, and the proportion of those that are delivered and are 'affordable' will be less than 40% (VWH and SODC agreed to reduce the figure to 30% for Great Western Park). So the VWH's ability to provide enough affordable housing to meet predicted needs is almost certainly going to get worse not better. This seems such a fundamental problem of local housing provision that there should at least be some discussion of how following the dictats of the Regional SE Plan in the Local Development Framework consigns it to fail to deliver local needs. It is not even clear if VWH has considered whether there is a potentially better local housing plan, even if counter to central ideas. Or is it just an insoluble problem? As it stands though this important issue is left up in the air.
