

REPORT OF THE DEPUTY DIRECTOR (PLANNING & COMMUNITY STRATEGY)
TO THE STRATEGIC AND LOCAL PLANNING ADVISORY GROUP AND THE DEVELOPMENT
CONTROL COMMITTEE
24 MAY 2006

Formal Consultation on the draft South East Plan Submitted to the Government

1.0 Introduction and Report Summary

- 1.1 The South East England Regional Assembly (SEERA) submitted the draft Plan for the South East to Government in March this year. It is the Regional Spatial Strategy for the South East and sets out how the region will develop to 2026. It follows extensive public consultation – this Council having commented on the emerging plan in March 2005 and the draft housing figures in October 2005. When approved, the South East Plan will replace current regional guidance (RPG9) and the Oxfordshire Structure Plan, and will become part of the development plan for the district. It will form the context within which the Council's Local Development Framework (LDF) will be prepared and will be a significant material consideration when planning applications are determined. It will provide the context for other key regional strategies and incorporate the regional transport strategy. The closing date for comments is 23rd June 2006.
- 1.2 All Members of the Council have been sent an Executive summary of the draft South East Plan. Copies of all the documents submitted including the full draft plan, pre-submission consultation statement, sustainability appraisal, implementation plan and monitoring framework are available in the local services points in Abingdon and Wantage, the Council Office in Faringdon and the Members Lounge in Abbey House.
- 1.3 This report summarises the key features of the draft plan as they affect the Vale and outlines a proposed response from the Council. Section 4 of this report outlines and comments on the main features of the region-wide policies and section 5 focuses on the policies for Central Oxfordshire and the housing figures for the Vale of White Horse. A report on the South East Plan incorporating where appropriate the views of the Advisory Group and Development Control Committee will be considered by Executive on 2 June and Council on 14 June. Relevant sections of the draft Plan have been circulated to assistant and deputy directors and a workshop of officers held to help formulate the Council response.
- 1.4 The Key dates for the next steps of the South East Plan are as follows:
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|--------------------------|---|--|
| 31 August 2006 | - | the Panel publishes matters to be discussed at the Examination in Public and the participants to be invited |
| End of September | - | comments on matters and participants due |
| 23 October | - | final list of matters and participants published |
| 9 November | - | participants' statements to be submitted |
| 28 November | - | Examination in Public starts |
| 28 November-15 December | - | regional and general matters to be discussed |
| 16 January 2007–30 March | - | sub-regional matters to be discussed |
| 27 February – 9 March | - | Gatwick, London Fringe, Western Corridor, Oxfordshire and Milton Keynes and Aylesbury Vale sub regions to be discussed |
| End of July 2007 | - | Panel Report due. |
- 1.5 The contact officer for this report is Katie Barrett, Section Head (Planning Strategy) telephone number 01235 540339

2.0 **Recommendations**

2.1 *It is recommended that the Executive recommends Council to make representations on the South East Plan as set out in Sections 4 and 5 of this report.*

3.0 **Relationship with the Council's Vision, Strategies and Policies**

3.1 This report complies with the Council's vision and aims. The South East Plan will have a significant bearing on all the Council's strategies and including those related to land use planning.

4.0 **The Main Features of the Draft Plan with Officer's Comments**

General Comments

4.1 Overall the main aims and objectives of the draft plan and the thrust of the core strategy are welcome, and officers believe it should generally be supported. However, on a practical note the policies in the main are too long, repetitive and are a mixture of aspiration, process and policy. While this is understandable to some extent as it is a spatial rather than a traditional land-use plan, greater clarity is needed in defining what specifically is intended as policy as the document will become part of the development plan for the district within which local development documents must fit and against which planning applications will be determined. It is somewhat surprising that the Vision and Core Strategy sections of the plan (Section C) contain no specific policies to enshrine the preferred spatial approach and agreed scale of development to be achieved. There would be greater clarity if the core strategy section contained appropriate, focussed and concise policies: these would not need repeating elsewhere in the Plan. To implement the proposals in the draft Plan effectively will have significant implications for the future work of this Council and the resources needed to carry it out (see particularly paragraphs 4.8, 4.12, 4.15 and 4.20 below). **Officers consider these general comments should be forwarded to the Panel.**

The Scale of Development and the Preferred Spatial Strategy (Section C pages 28-39) of the draft Plan

4.2 **Headlines** -The strategy proposes an annual average growth level of 28,900 dwellings a year and assumes an economic growth rate of 3% per annum gross value added (GVA) for the first ten years of the plan. A growth figure for the economy after 2016 will be incorporated in a review of the plan.

4.3 The preferred spatial strategy is to

- promote sustainable development in all parts of the South East
- ensure development only takes place when necessary infrastructure is available or will be provided in time
- address intra-regional disparities
- support strategic development at the growth areas (Thames Gateway, Ashford, Milton Keynes) and in South Hampshire
- support economic growth which minimises pressures on land and labour
- use existing Green Belt designations to control urban growth.

As stated in paragraph 4.1 above, there are no specific policies included to give clarity and focus to the spatial strategy.

4.4 **Comment** – It is understood that central Government considers that the South East should be accommodating significantly higher levels of growth than proposed in the draft plan and GOSE has commissioned consultants to assess a housing distribution based on higher levels of growth. This Council previously endorsed a growth figure of 32,000 dwellings a year. However,

Members should be aware that 45% of respondents to the previous consultation supported growth at 25,500 dwellings a year or less. In reaching the overall figure the Regional Assembly also took account of housing need, the impact of development and its deliverability. Taking account of the need for major investment in infrastructure and affordable housing, your officers would not dissent from the scales of growth proposed provided the assumptions about economic growth beyond 2016 are updated and included in a revised Plan in the next 5-6 years. The spatial strategy should be broadly supported, particularly the commitment to maintain existing Green Belt designations and to address intra-regional disparities which should help to reduce pressures on the increasingly congested western parts of the region. **Officers consider that the proposed levels of growth and the spatial strategy should be broadly supported, subject to adequate infrastructure being provided and the assumptions about economic growth beyond 2016 being updated and included in a revised plan in the next 5-6 years.**

Cross Cutting Policies (Section D1, pages 42-54)

- 4.5 **Headlines** - There are cross cutting policies to promote sustainable development and mitigate and adapt to climate change, reduce resource use, promote sustainable construction methods, provide infrastructure, use public land, ensure inter-regional connectivity, focus development in urban areas and regional hubs (including Oxford), reduce inter-regional disparities, retain Green Belts and identify strategic gaps, support an aging population and conserve and enhance the environment and quality of life.
- 4.6 **Comment** – These policies are broadly welcomed, particularly the emphasis on protecting existing Green Belts (policy CC10a), the conservation and enhancement of the environment and quality of life (policy CC12); the intention to keep the scope for further links with the South West Region under review as this is particularly important for this Council in view of the proposed expansion of Swindon (policy CC7); the aim to concentrate development within the urban areas and seek 60% of development on brownfield land (policy CC8a); and addressing intra-regional disparities (policy CC9).
- 4.7 The emphasis on development not proceeding until the infrastructure is available or will be provided in time (policy CC5) is welcome having been a consistent concern of this Council. There will be a key role for the local strategic partnerships to inform and co-ordinate the plans and strategies of the separate organisations to support the growth proposed in the Plan. However, your officers have concerns that the funding gap that too often exists between what the development industry can provide through legal agreements and the total investment needed to provide sustainable communities will not be filled by central Government or local taxation. If there is a funding gap the Planning Inspectorate will have to be prepared to refuse applications at appeal solely on this basis if we are not to experience growth and development without the infrastructure local authorities consider necessary. The objective of achieving sustainable development is welcome (policy CC1), but the criteria to achieve it, including good governance and using sound science responsibly, do not relate directly to the definition of sustainable development and lack clarity on implementation. The policy to prevent the coalescence of settlements by defining strategic gaps (policy CC10b) is potentially useful but it is regrettable that it will only apply to settlements each with a population of 10,000 or more as it is often the rural character and separate identity of villages that need protecting from nearby urban growth. As an example Wantage and Grove have populations of approximately 11,000 and 7,500. The population of Grove is unlikely to exceed 10,000 until around 2013/14.
- 4.8 The policies to reduce the region's 'resource footprint' (CC2-CC4) are important but they are likely to have a significant impact on the future work of local authorities through the measures highlighted including improving the energy efficiency of new and existing buildings, promoting carbon sinks, encouraging the development and use of renewable energy, reducing the amount of biodegradable waste land filled, ensuring the new and existing buildings stock is resilient to the impacts of climate change, incorporating sustainable drainage measures and high standards of water efficiency in new and existing building stock, and increasing flood storage capacity. Policies relating to the increased efficiency of resource use are a key feature, including promoting energy

and water efficiency standards that exceed current building regulations and new buildings that provide a proportion of energy demand from renewable resources and are built using low-impact materials. Many of these policy 'requirements' for new developments go beyond existing building regulations and Government planning guidance and it is difficult to see how they can be implemented effectively and speedily through the development control process. Building regulations would be a more efficient way improving the quality of new development and representations should be made accordingly to Government. **Officers consider the cross cutting policies should be broadly welcomed and policies CC7, CC8a, CC9, CC10a and CC12 specifically supported. Policy CC5 on infrastructure should be supported and the need for it to be implemented effectively and for major investment from central government highlighted. Comments should also be made on policies CC1 and CC10b as set out in para 4.7 above and policies CC2-CC4 as set out in paragraph 4.8.**

Economy (Section D2, pages 55-71)

- 4.9 **Headlines** - The draft plan has a range of policies to promote important business sectors and clusters, provide a good range of sites and premises, improve skills and training, promote the development of ICT enabled sites, maintain and enhance the most economically successful parts of the region (including Central Oxfordshire) and address the structural economic weakness of the under performing areas.
- 4.10 **Comment** – The employment policies promote economic development with insufficient reference to achieving this through sustainable economic growth, instep with the labour force of the area. This is particularly important as employment grew faster than population between 1991 and 2001 resulting in a tightening of the labour market. Policy RE1 for example supports regionally important clusters but with no reference to achieving this in a sustainable way. Criterion i) of the policy requires local development documents to ensure land and premises are available to meet their requirements without reference to other factors. Members will be aware that Harwell and Milton Park contain important business clusters. Indeed the Government announced in the 2006 budget its decision that the Harwell site should be developed as the Harwell Science and Innovation Campus. Given the concentration of science based enterprises at Harwell and the major investment in Synchrotron, pressure for further economic growth building on the current successes of the area can be expected especially as the Inspector recommended, and the Council accepted, the removal of the 1986 floorspace limits. Significant investment in public transport and other non-car modes will be needed to these sites, but even with this the single largest constraint to the development of Harwell and Milton Park will be congestion on, and the capacity of, the A34. Clear guidance is needed at an early stage from Government as to what measures will be taken, or whether congestion on the A34 will inhibit growth in the area generally. It should be noted that the A34 is designated in the plan as an inter-regional corridor (See Communication and Transport section).
- 4.11 There are two specific points of concern with policy RE2 which contains a list of criteria for identifying employment land. One of the criteria refers to intensifying the use of existing sites. This could be used to justify and promote unsuitable rural sites and should be reworded to refer to 'existing sustainable sites'. The policy also supports non-land based businesses on farm sites which could result in the construction of new buildings for commercial purposes in the countryside. This would be contrary to PPS7 which states that new buildings in the open countryside away from existing settlements should be strictly controlled. It should refer instead to 'existing rural buildings'. Policy RE5, which seeks to reduce intra-regional disparities and promote smart economic growth (defined as maximising the productive value of the workforce, land and natural resources) should be supported. However, the definition of smart growth needs more clarity and explanation, particularly with the reference to natural resources, and it should refer to "employment land" rather than just "land".
- 4.12 Members should be aware that if such policies are taken forward local authorities will be expected to be involved in future work that could have significant implications for staffing and

resources, including regular employment land reviews, developing delivery mechanisms to unlock sites with economic development potential, promoting business clusters, developing skills and promoting advances in ICT and changing work practices. **Officers consider that objection should be made to the lack of reference to sustainability issues in the employment policies (particularly policies RE1 and RE2). Concern should be expressed that the development of the regionally important business clusters at Milton Park and Harwell could be inhibited by congestion on the A34 and this needs resolving at an early stage. Objection should be made to the last part of policy RE2 which refers to supporting non-land based businesses on farms. Policy RE5 on reducing intra-regional disparities should be supported but clarification sought on the definition of smart growth.**

Housing (Section D3, pages 72-91)

- 4.13 **Headlines** - The draft South East Plan policies provide for an average annual building rate of 28,900 dwellings in the South East between 2006 and 2026. This figure includes an allowance for the backlog of current housing need in 2001 and local authorities will have to say specifically how this has been addressed. The Vale is given an annual build rate of 575 dwellings equating to a total of 11,500 dwellings over the 20 years. The figure assumes that the 3,000 dwellings proposed at Didcot in addition to the current provision in local plans will be split equally between the two districts. The plan states that further advice will be given by the County Council as part of this consultation exercise. Any over or under delivery to 2006 in relation to RPG9 levels should be addressed in LDDs. The focus of development will be on previously developed land. There should be a mix of housing types, sizes and tenures, 25% should be social housing for rent and 10% other forms of intermediate housing. Densities should achieve a regional average of 40 dwellings a hectare. There is an emphasis on high standards of design and making better use of the existing housing stock. There will be an early partial review of the Plan in the light of local gypsy and traveller assessments.
- 4.14 **Comment** – The housing figures for the Vale are discussed in more detail in section 5 of this report. Putting this issue on one side it is considered that the bulk of the other housing policies should be generally supported particularly the requirement that LDDs should specify housing tenure (policy H4) the emphasis on raising the quality of design (policy H5) and improving the existing stock (policy H7). However, it is not considered necessary to adjust the figures in policy H1 to take account of any over or under supply to 2006 in the context of the 20 year plan as the completion figures for 2005 were available to the Assembly. In any event it is not possible to relate the district housing figures to those in RPG9 as they are on a county wide base only. Similarly it is difficult to see how the Council can demonstrate that the backlog of unmet need is being met (policy H1) as some 60% of the need cannot be disaggregated to the district level.
- 4.15 Members should also again be aware of the resource implications of the future work that local authorities are expected to undertake if the plan is to be implemented as currently proposed. Work will include housing delivery action plans, urban potential studies, housing need and market assessments which identify the full range of housing needs in their areas, comprehensive policy guidance on financial viability of affordable housing, empty homes strategies, guidance for the design of new housing that encourages sustainable construction methods and address the implications of changing lifestyles and incentives for small households to move from large to smaller dwellings. Gypsy and traveller accommodation assessments are currently being undertaken by ACTVAR. Oxfordshire currently has a relatively high number of caravans on authorised sites (318) and a relatively low number on unauthorised sites (26). **Officers consider that policies H4, H5 and H7 should be supported and concerns should be expressed about policy H1 for the reasons given in para 4.14.**

Communications and Transport (Section D4, pages 92-103)

- 4.16 **Headlines** - This chapter forms the Regional Transport Strategy (RTS) within which other strategies, including those of the Highways Agency and the rail industry and local transport plans, should be developed. Policies promote managing the transport system to make the most of

existing capacity (including road pricing and charging, more demanding yet flexible parking standards and a requirement that all major travel generating developments as identified in local development documents must have travel plans by 2011) and investment in non-car modes of access (walking, cycling, public transport and ICT). The transport system is to be upgraded to support the international and inter-regional movement corridors (including the A34) and regional hubs and spokes (Oxford is a regional hub with the A420 to Swindon one of its spokes). The Plan suggests there should be no further growth at Heathrow and Gatwick beyond that already agreed and encouragement is given to Southampton airport to enhance its role as an airport of regional significance. Similarly there is a policy to enhance the role of Southampton port for car ferries and deep sea containers. Up to three locations for rail freight inter changes are to be identified and submissions are likely to be made at the Examination in Public.

- 4.17 **Comments** – The policies are based largely on the existing RTS which the Council has previously supported. However, there are concerns that significantly enhancing the port at Southampton could increase the use of the A34. While its designation as an international and inter-regional corridor (policy T1) is both welcomed and is to be supported as it may justify additional investment, it must be recognised that the road is an important local artery in Oxfordshire which supports development of regional significance including the important business clusters at Harwell, Milton Park and Oxford. **Officers consider that the identification of the A34 as an inter-regional movement corridor in policy T1 where investment will be prioritised should be supported subject to the caveat above. Comment should be made that policy T1 should specifically support and promote investment in the transport infrastructure necessary to support the growth proposed in the sub-regional strategies. The identification of the A420 as a regional spoke should be supported (policy T2). An objection should be lodged as there are no policies to promote the east-west rail link or rail passenger travel, and concerns should be expressed at policy T11 which proposes enhancing the role of Southampton port.** The Council will also have to be aware of the proposals for rail freight interchanges which, depending on their location, could have an impact on the Vale.

Natural Resource Management (Section D5, pages 104-136)

- 4.18 **Headlines** - Policies aim to improve water quality and management, safeguard land for new reservoirs (including one in the Upper Thames by 2019/20), reduce the risk of flooding, improve biodiversity, enhance woodland cover, energy efficiency, promote the use of combined heat and power, district heating and renewable energy.
- 4.19 **Comments** – The previous consultation draft Plan supported the creation of new reservoirs but the five were named in the lower case text, not the policy itself as now (policy NRM2). The Council already has criteria based policies in its adopted and emerging local plans against which any planning application for a new reservoir would be considered. It would be premature to safeguard land for a reservoir until a convincing case has been made for a reservoir in the Upper Thames Valley and its location in a particular district. The Council should object to this policy and suggest it is reworded to confirm that only where the need for additional water resources is established should local development documents allocate and safeguard sites. As water resources can be proposed through a compulsory works order the last sentence of NRM2 should say 'when considering proposals' (not applications).
- 4.20 Again, Members should be aware of the increasing impact of the policies on local authorities which will have implications for staffing and resources. These include seeking measures to achieve high levels of water efficiency BREEAM (Building Research Establishment Environmental Assessment Methodology) standards, identifying infrastructure needs of water and sewerage companies and the Environment Agency, requiring energy efficiency and use development of renewable energy to contribute to the regional targets. **Officers consider that objection should be made to policy NRM2 as set out in paragraph 4.19 above).**

Waste (Section D6, pages 137-161)

- 4.21 **Headlines** – Policies seek a reduction in the growth of waste, the re-use of construction and demolition materials, and layouts that provide adequate space for the storage and re-use of waste (including composting). Authorities are expected to manage the waste generated within their areas. Oxfordshire is to provide landfill capacity of 4.4 million tonnes of waste from London. There are regional targets to reduce the amount of landfill and increase recycling and composting. Policies enable new facilities for recycling and recovery, giving priority to safeguarding and expanding existing suitable sites with good transport connections.
- 4.22 **Comment** – The policies in this section appear to be consistent with the targets set by DEFRA and with the strategy for the collection and disposal of municipal waste currently being prepared by the Oxfordshire authorities. In 2015 Oxfordshire will have a surplus capacity of 1.6 million tonnes in existing sites. Members should be aware that the need to reduce landfill will result in a requirement for other facilities including waste transfer, separation, recovery, diversion, management and possibly incineration. **Officers consider that no representations need to be made on this subject.**

Minerals (Section D6, pages 162-173)

- 4.23 **Headlines** – The use of recycled and secondary aggregates is encouraged to reduce the demand for primary aggregates and Oxfordshire is to provide 0.9 million tonnes of recycled and secondary aggregates a year. Recycling facilities will not be precluded from Green Belts but will only be allowed in AONBs in very exceptional circumstances. Oxfordshire is to maintain a seven year land bank for sand and gravel on the basis of producing 1.82 million tonnes a year (policy M3).
- 4.24 **Comments** – Although the amount of sand and gravel to be produced in Oxfordshire is to reduce by 9% from that agreed in 1994 it is significantly less than the region-wide reduction of 20%. This fails to take into account that Oxfordshire is poorly located to the main areas for growth and that the aggregate resources are affected by environmental constraints. **Officers consider that objection should therefore be made to policy M3.**

Countryside and Landscape Management (Section D7, pages 174-178)

- 4.25 **Headlines** – The South East Plan gives priority to protecting and enhancing the New Forest National Park and Areas of Outstanding Natural Beauty: elsewhere high quality management of open countryside should be encouraged. Local authorities through rights of way improvement plans should encourage access to the countryside.
- 4.26 **Comments** – The policy to encourage high quality management of the countryside (policy C3) refers to supporting local economies through small scale development to meet local needs. For a development plan policy this is not sufficiently rigorous and could be used to justify inappropriate and potentially unsuitable development in the countryside. It needs to be linked specifically to development needed to support land management systems in ways that maintain and enhance local distinctiveness as referred to in para 1.12 of section D7. **Officers consider that objection should be made to policy C3 as it could enable new buildings for business development in the countryside.**

Built and Historic Environment and Town Centres (Sections D8 and D9, pages 179-202)

- 4.27 **Headlines** – There are policies for the significant improvement of the urban environment and managing the urban – rural fringe. Local Development Documents should set out overall strategy and incorporate clear design guidance for the intensification of residential neighbourhoods. In

addition they should support the role of small rural towns through small scale development and plan positively for limited small scale growth in villages to meet defined local needs. The Plan identifies a network of primary and secondary regional centres as a focus for large-scale development (Oxford and Banbury are the two regional centres in Oxfordshire). Further large-scale out-of-centre regional shopping centres will be discouraged.

- 4.28 **Comment** – Although paragraph 1.35 of section D9 refers to the expansion of Bicester and Didcot there is no clear policy direction for the market towns of Oxfordshire which fall between the definition of regional centres (policy TC2) and small rural towns (policy BE5). **Officers consider that concern should be expressed at this omission.**

Tourism, Sport and Recreation (Section D10, pages 203-217)

- 4.29 **Headlines** – Policies promote tourism and recreation based rural diversification, seek to upgrade and develop new regionally significant sports facilities, improve existing tourist accommodation and attractions and develop new regionally significant attractions where they can be easily accessed by public transport. Oxford and the River Thames are identified as priority areas for tourism.
- 4.30 **Comments** – The recognition that joint working between Oxford and neighbouring authorities to encourage visitors to stay in the area longer is welcomed (policy TSR7 iii) as is joint working along the River Thames to achieve the potential for informal recreation and sporting uses (TSR7 iv) and resist the loss of tourism infrastructure such as public open spaces, car parks, moorings and access points (para 8.8 of section D10). **Policy TR7 should be specifically supported.**

Social, Cultural and Health (Section D11, pages 218-232)

- 4.31 **Headlines** – Local planning authorities should have policies that target areas of social deprivation; support healthy communities; ensure land is available to meet the health care and educational needs of local communities; increase participation in sport, recreation and cultural activities especially of socially disadvantaged and socially excluded groups; and encourage mixed use community facilities.
- 4.32 **Comments** – The Plan places the responsibility for ensuring adequate social, cultural and health facilities with local authorities, even where they are not the primary providers. This is misleading and puts an unreasonable requirement on local authorities to ensure the provision of services over which they have no control. The plan makes no reference to and should take more account of regional recreation strategies prepared by Sport England and London 2012. **Concerns should be expressed to this section on this basis.**

5.0 Central Oxfordshire and the Housing Figures for the Vale of White Horse District Council (Section E7, pages 314-321)

Headlines

- 5.1 **General Policy Approach** – Central Oxfordshire, one of the ten sub-regions, is focussed on Oxford and includes land in all five districts. Abingdon, Botley, Wantage and Grove are within the Central Oxfordshire area. The core strategy provides for development in ways which will protect and enhance the environment and the setting of Oxford, make best use of previously developed land and concentrate development where the need to travel particularly by car can be reduced. The main locations for development will be Bicester, Didcot, Wantage & Grove and within the built up area of Oxford. A Green Belt will be retained around Oxford and 50% of all new housing should be affordable. Priority is to be given to economic development which supports educational, scientific, technological and emerging business clusters. Access to Oxford from major towns in the sub-region and neighbouring sub-regions is a priority. Future development is contingent on the delivery of infrastructure to support it.

5.2 **Housing Requirement for the Vale** – 11,500 additional homes are required in the Vale between 2006 and 2026 (policy H1) with some 10,500 dwellings to be provided in the Central Oxfordshire part of the Vale (policy CO2). The lower case text to policy CO2 states that the housing distribution allows for about 7,300 homes at Didcot and 3,400 at Wantage and Grove (para 2.4 of section E7). This latter figure is 900 more than the allocation in the emerging local plan for 2,500 homes on the former airfield at Grove. It is also noted that the 3,000 dwellings at Didcot proposed between 2016 and 2026 have been split equally between South Oxfordshire and the Vale for illustrative purposes only, until more detailed work (including a crucial strategic flood risk assessment) establishes the most appropriate location.

Comment

5.3 The approach of focussing development in the larger settlements without compromising the Green Belt is similar to that in the adopted Structure Plan and is consistent with the Vale's Local Plan and can be broadly supported. Policy CO1 names Didcot and Wantage & Grove as main locations for development in the south of the county which again reflects the adopted Structure Plan and the emerging Local Plan for the district. However, the reference to the increase of 18,300 jobs by 2016 should be omitted (para 2.13) given the considerable degree of uncertainty that applies to the forecasts. It is also considered that the transport policy (CO6) which prioritises access to Oxford should also include a priority to promote investment in the Grove/Wantage and Didcot corridor as included in the adopted Structure Plan 2016. This would also give a sound basis for the transport schemes listed in the Implementation Plan. Policy CO7 on infrastructure should be strongly supported. Members should note that the policy to achieve 50% affordable housing in Central Oxfordshire may be difficult to achieve especially as this Council's local plan Inspector recommended an affordable housing provision of 40% rather than 50% based on a detailed analysis and appraisal of the level of local housing need at the local plan inquiry.

5.4 Members will recall that the Executive on 21 October last year supported the option of focusing the 8000 homes that may need to be provided on greenfield sites equally between Didcot and Bicester (rather than the option of a stronger focus in the south of the county), but

- i) considered that the housing requirement for Oxford should be increased and
- ii) given the difficulties in providing a satisfactory transport package to support the growth already planned in the Didcot area, advised that further growth should not be supported until the Council is satisfied that there will be a deliverable and funded transport solution to current traffic problems in the area, including a Harwell by-pass, improved public transport and measures to resolve problems in the A34 corridor.

The Executive also resolved that before any limited further growth at Wantage/Grove could be supported, central Government must commit to additional infrastructure including improvements to the A417 and public transport. An extract of the Minutes of the Executive are in Appendix 1 to this report. The Council did not support the option of a stronger focus of development in the south of the county with 11,500 dwellings for the Vale, which was the second of the two options proposed.

5.5 The 11,500 dwelling requirement for the Vale is a significant increase in the building rate from that in the Structure Plan 2011 (within which the emerging local plan was prepared) and the currently adopted Structure Plan to 2016 as the figures below show:

Structure Plan 1996-2011	-	380 dwellings a year
Structure Plan 2001-2016	-	477 dwellings a year
Draft South East Plan 2006-2026	-	575 dwellings a year

It is the eleventh highest growth rate in the South East Region out of 69 authorities. What this may mean in terms of development in addition to existing commitments at 1 April 2006 on the basis of the draft figures for dwellings with planning permission and potential within existing

settlements is shown below:

	Central Oxfordshire	Remainder of the Vale	Total
Dwellings with permission ¹	1245	295	1540
Dwellings allocated ²	3550	550	4100
Potential in settlements ³	2540	410	2950
Potential supply	7335	1255	8590
Requirement 2006-2026	10,500	1000	11500
Balance to find	3165	+255	2910

¹ As at 1 April 2006 – the figures are draft only

² Including all the allocations in the draft local plan as proposed to be modified (with the full 2500 at Grove)

³ Assumes large sites (10 or more dwellings) at 75% of the rate expected 2001-2011 between 2011 and 2016 (i.e. 750) and 50% between 2016 and 2026 (i.e. 1000)

- 5.6 The figures for the potential in settlements are general estimates only, as even with a reasonably up to date urban capacity study it is difficult to predict how many dwellings will be built within existing settlements as most will be developed on land in an existing use. The figure for the remainder of the Vale outside Central Oxfordshire is particularly sensitive given there are a small number of villages and Faringdon is the only town. Members should consider whether the figure for the district outside Central Oxfordshire should be increased by 255 or 455

dwellings (the latter figure would allow a modest expansion of Faringdon) with a commensurate reduction in the Central Oxfordshire area of the Vale.

- 5.7 The 3165 dwellings to be found on sites outside the existing built-up areas of settlements in Central Oxfordshire (as indicated in the above table) includes a figure of 1500 dwellings for Didcot in addition to the allocations in the emerging Local Plan (discussed below). This leaves 1665 to be found outside Didcot in the Central Oxfordshire part of the district, if no adjustment is made as suggested in para 5.6 above. Members will be aware from the work carried out on the emerging Local Plan of the difficulties in finding suitable development sites on the edge of Abingdon, and that most of the safeguarded land at Botley has now been allocated for housing on the recommendation of the Local Plan Inspector. Officers are concerned at the implications of accommodating this number of dwellings on greenfield sites, as this could ultimately result in a significant expansion of some villages which is not a sustainable option for growth.

- 5.8 **Grove** – Of the 3,400 dwellings proposed for the Wantage and Grove area in the lower case text supporting policy CO2 (para 2.4), 2,500 are already planned on the former airfield west of Grove. The redevelopment of St. Mary's School and possibly one of the King Alfred's campuses, plus existing permissions could yield an additional 500 dwellings. This would leave some 400 dwellings to be accommodated on sites outside the existing settlements. This could be reasonably manageable given the 20 year time horizon. However, the redevelopment sites are included in the urban potential figure in the table in para 5.5 above and would not therefore contribute to the 'greenfield' requirement. Members may consider that an increased building rate for Wantage and Grove above the 3,400 proposed would not be acceptable bearing in mind the need to see first whether public transport can be improved sufficiently to deter car use to access job opportunities and secondly the opportunities for job growth above that anticipated to 2016 at Milton Park and Harwell.

- 5.9 It is imperative that further growth at Wantage and Grove above that provided for in the emerging local plan is supported by the necessary infrastructure – secondary education and transport being particularly important. The implementation plan (accompanying the draft South East Plan) specifically refers to local road improvements in the Grove and Wantage area, the link road north of Grove, and the Wantage north east relief road: these should be welcomed. In this context policy CO7, which states that development will be contingent on the timely delivery of

infrastructure, should be supported. However, paragraph 2.18 of Section E7 should specifically refer to the infrastructure, requirements at Grove and Wantage. The Council will also have to ensure, particularly through local strategic partnerships, that the infrastructure requirements are picked up in the plans and strategies of relevant service providers (including the Local Transport Plan, Integrated Transport Strategies and strategies for health care, education and water for example).

- 5.10 **Didcot** – The County Council reduced the additional housing requirement from 4,000 to 3,000 dwellings after 2016 from that proposed last autumn, although the technical justification for this is not clear. The Councils are expected to give advice as to how the 3,000 dwellings should be apportioned between South Oxfordshire and the Vale. Although the two district council's have appointed consultants to look at future development at Didcot their work is not yet complete and an issue of flood risk on some potential areas for growth has been identified. This will not be a barrier to further growth at Didcot but may be a factor in identifying preferred locations. A strategic flood risk assessment is being undertaken and should be available to inform the Examination in Public.
- 5.11 The Council has always accepted that Didcot is potentially the most sustainable location for growth in the south of the county close to the major employment sites of Milton Park and Harwell. Further growth of the town may help to support additional services and facilities for the town and the recent development of the Orchard Centre is an example of this. However, it is crucial that there is investment in a wide range of facilities and, from this Council's perspective, particularly in transport to mitigate the problems of increased levels of traffic in nearby villages – most notably Harwell. In this context the references to the Harwell by-pass in the implementation plan are welcome.
- 5.12 Officers suggest that the number of dwellings to be accommodated in the Central Oxfordshire part of the Vale is too high and could result in the need to find some 1265 dwellings on 'greenfield' sites outside Didcot, Grove and Wantage. If an objection is made to the EiP Panel on this basis it is suggested that the Council should indicate what figure would be appropriate and where the balance should be found. An increase of 300 dwellings for the Vale outside Central Oxfordshire with a commensurate reduction in Central Oxfordshire, plus further reduction of 700 in Central Oxfordshire would be likely to give more reasonable figure for the district as follows:

	Central Oxfordshire	Remainder of the Vale	Total
Revised requirement	9500	1300	10,800
Potential supply	7335	1255	8590
Balance to find	2165	45	2210
less Didcot	<u>1500</u>		
	<u>665</u>		

The 700 dwellings not provided in the Vale could be reapportioned to Oxford or other towns in Central Oxfordshire, including Didcot. **Members are asked to give a view on whether this approach should be pursued in preparation for the EiP.**

- 5.13 Officers suggest the following response could be made to the Central Oxfordshire policies and the housing requirement for the Vale:
- the strategy to focus housing development in towns beyond the Green Belt and the Implementation Plan for the sub-region is broadly supported provided that development at Grove, Wantage and Didcot are accompanied by investment in the necessary infrastructure and services. Without it the Council will not grant planning permission for the major levels of growth proposed;
 - the housing requirement for the Vale should be reduced by 700 dwellings from 11,500 to

10,800 and the figures for Central Oxfordshire and the remainder of the Vale changed to 9,500 and 1,300 respectively;

- support policy CO3 protecting the Green Belt;
- policy CO6 on transport should also refer to priority to be given to improving transport infrastructure in the Grove/Wantage and Didcot corridor as in the approved Structure Plan 2016 to support the major levels of growth proposed;
- policy CO7 which states that development is contingent on the timely delivery of services should be strongly supported, but that reference should be made in the lower case text to the need for infrastructure in Grove and Wantage, particularly for secondary education;
- the split of the housing requirement for Didcot between South Oxfordshire and the Vale cannot be determined at this stage in view of the need for a strategic flood risk assessment but information will be provided in time to inform the Examination in Public;
- object to the reference to 18,300 jobs by 2016 in paragraph 2.13 as this is based on forecasts which are subject to considerable uncertainty.

RODGER HOOD

Deputy Director (Planning & Community Strategy)

TIM SADLER

Strategic Director

Background Papers: