

REPORT OF THE DEPUTY DIRECTOR (PLANNING & COMMUNITY STRATEGY)
TO THE EXECUTIVE
17 OCTOBER 2008

Proposed changes to the draft South East Plan

1.0 Introduction and Report Summary

- 1.1 The Government is consulting on the proposed changes it intends to make to the draft South East Plan that will guide development in the region to 2026. The closing date for comments is 24 October 2008. Members will recall that the draft plan was prepared by the South East England Regional Assembly (SEERA). It was submitted to Government in March 2006 and after a period of consultation an examination in public was held (November 2006 – March 2007) where an independent panel of planning inspectors tested the plan for soundness. The report of the panel, including their recommended changes, was published in August 2007. The Council made comments on the panel's recommendations (see report to Executive October 2007).
- 1.2 Three key documents have been received
- a schedule of the changes proposed to the draft plan with the Secretary of State's reasons for doing so (532 pages)
 - a sustainability appraisal and habitats regulation assessment (40 pages) and
 - a companion document showing what the final plan would look like if all the changes proposed were incorporated (313 pages).
- These documents are available for public inspection at the local services point and the members lounge in Abbey House. They can also be viewed on the Government Office web site at www.gose.gov.uk/planning/regional_planning and there is an item for information on the Council's web site.
- 1.3 Section 4 of this report very briefly summarises the key changes proposed and focuses on the implications of the changes for Central Oxfordshire and the Vale. The South East Plan is important as when approved it will replace the Oxfordshire Structure Plan and along with key documents in the Council's Local Development Framework it will form the development plan. All plans and strategies of the Council must take the development plan into account, and applications for planning permission should be determined in accordance with it.
- 1.4 The contact officer for this report is Katie Barrett (Development Policy Manager) telephone (01235 540339). Email address katie.barrett@whitehorsedc.gov.uk

2.0 Recommendations

- 2.1 *The Advisory Group recommends the Executive to inform the Secretary of State for the Environment that the Council:*
- (a) *Broadly supports the proposed changes to simplify the structure and format of the South East Plan, in particular the definition of a clear spatial strategy, and make the wording clearer, more focused and more succinct than in the draft plan. However, the focus for Central Oxfordshire should be managed economic*

growth as this more accurately reflects the policies for the sub region. It is also regrettable that some proposed policies that set out the approach local authorities should take when preparing LDFs in the form of a list of criteria (e.g. Policy C7) have not been expressed as general policies that could be used to determine applications – this would have obviated the need for policies in local development documents covering the same matters.

- (b) The changes to the wording from general intentions to a more positive approach, and the use of the word 'will' rather than 'should', put a much greater onus on the local authorities to deliver, particularly through the LDF process. Whilst this is not unreasonable, or the tasks difficult in themselves, the implications for local authorities are considerable. LDFs are required to have a greater scope, give greater certainty and detail early in the development process, and cover a much longer time period than the local plans they replace. The Government should not expect such plans to be delivered more quickly than old style local plans particularly in view of the need to consider all reasonable options, the much greater emphasis on a robust evidence base, limited public funds (including the requirement for year-on-year efficiency savings), the shortage of experienced planning staff and the demands being put by all local authorities on the service providers who may be unable to respond fully in the timescales set out.*
- (c) The Council objects to the removal of the conditionality clause in policy CC7, which stated development would only be allowed if there was the infrastructure to support it, as, particularly through the development control process, it could result in unsustainable development and lead to a continuation of past trends of under investment in the region that could damage its social and economic strengths. The Government should recognise that councils cannot be held responsible for those aspects of delivery they do not control: the market and Government spending on infrastructure and affordable housing play a large part. The need for infrastructure to support the social well-being and economic vitality of the South East should be fully reflected in future Government spending reviews.*
- (d) While there is no objection to the deletion of the policy on strategic gaps at the regional level, the reasons for doing so must not preclude such designations at the local level. The panel recognised this may be necessary where gaps between settlements cannot be protected by landscape and other policies. PPS7 is not sufficient to prevent the coalescence of settlements where the open gaps are very narrow.*
- (e) There should be references to the need to ensure inter-regional connectivity, including with the South West region, in the text introducing the spatial strategy.*
- (f) The Council objects to policy RE1 as it should refer to employment land reviews being the basis for the provision of employment land in LDFs. As worded it would allow for the release of more employment land than justified by employment land reviews in response to something as ill defined as changes in the global economy. It pushes down to a local level decisions that should be made at the national or regional level and could result in speculative applications and subsequent appeal decisions leading to a significant over development of employment land in some areas in relation to the level of housing and other planned infrastructure, which would not be sustainable. The*

Government should set out in the RSS what levels of employment development will be appropriate. Otherwise the decision over the level of development in the most important area of the UK for employment will be left up to individual Councils. This approach contradicts the early review of employment land suggested under policy RE3.

- (g) Policy RE5 refers to local authorities enabling businesses to operate as efficiently as possible in relation to movement. There should be recognition that the means to effect improvements in movement lie outside the hands of local authorities and are the responsibility of Government. Councils cannot improve the capacity of trunk roads, motorways or railways. Without Government support on this aspect Councils cannot operate this.*
- (h) While the Council is pleased that the overall level of housing in the district has increased by only 60 houses over the 20 years, it objects to policy H1 as it does not give clear strategic guidance on the levels of housing development to be planned for, and fails to give certainty to communities, service providers and developers. Although there are figures for the minimum number of houses to be provided in each area, local development frameworks are expected to test higher levels of housing development. These are key strategic matters that should be resolved at the regional level and not in an ad hoc way through a myriad of local development documents. It puts additional demands on an already complex LDF process and it is not at all clear how local authorities will know whether they have done sufficient testing and whether any increase proposed will be in general conformity with the overall strategy of the RSS. Furthermore the approach could leave the way open for decisions to be taken on higher levels of growth through the development control process. Especially when taken in conjunction with policy RE1, it undermines the ability to plan comprehensively for balanced housing and employment growth and the provision of infrastructure and services to meet the needs of new development. It undermines the objectives of sustainable housing and the validity of the sustainability appraisal undertaken at the regional level. The reference to the housing figures being minimal should therefore be deleted and any increase sought should be determined through a review of the South East Plan. The Council also objects to the reference to councils assessing the ability to accelerate the rate of housing delivery in the new growth points (which includes Didcot) as this is something that should be assessed through the review of the South East Plan.*
- (i) If the Government retains the figures in policy H1 as minima, clarification is required that the need to provide a 'minimum annual average' rate of housing does not mean that over provision in one year will not count towards the overall total, or that the requirement to plan for an upward trajectory of housing completions does not necessitate a year on year increase in completions. In addition it is not at all clear how local authorities are to test the longer term issues arising from eco-towns through emerging LDFs when so little is known about them – this should be something the Government takes into account when it assesses whether particular proposals should be pursued.*
- (j) The Council objects to policy NRM3 as the Environment Agency has concluded that currently it cannot support Thames Water's proposed reservoir. If the reservoir is not required to be as large as currently proposed, then in the Council's view there is no need for it to be located in Oxfordshire. The*

geographic reference to the Upper Thames Reservoir being in Oxfordshire should therefore be removed from policy NRM 3.

For Central Oxfordshire and the Rest of the Vale

- (k) While the objective of improving self containment of towns is generally supported, the plan must recognise that much of the employment for Didcot and Wantage/Grove will be provided at Milton Park and Harwell. Policy CO1 should seek the self containment of the Quadrant area as a whole and not the individual settlements.*
- (l) The redistribution of some dwellings from the Central Oxfordshire part of the Vale to the figures for the rest of the district although small is welcome (policies CO1 and AOSR1).*
- (m) The Council objects to the way the south Oxford strategic development area (SDA) has been justified. The regional imperative to deliver higher housing numbers could be met elsewhere in the South East: therefore it is not an exceptional circumstance that over-rides Green Belt policy. Furthermore the Western Otmoor eco-town as proposed would provide housing linked to Oxford by a fast, free and frequent public transport services. It is not, therefore correct to say at this stage that there is a lack of alternatives to the strategic development area.*
- (n) The Council objects to proposed paragraph 22.15 and the last sentence of paragraph 22.20. As worded there is no guidance on who will judge whether the land south of Oxford is unsuitable for development. It is not realistic to assume that the local authorities would agree alternative locations for the 4,000 homes proposed for this area. Even if agreement could be reached it is difficult to see how this could be tested at examination – which could involve two or more different LDFs and would seriously prejudice public involvement in the process. Such proposals would not be in general conformity with the South East Plan and could result in legal challenges. The desire for flexibility to achieve the building rates proposed creates considerable uncertainty and may affect delivery. Furthermore it is not consistent with the Government's previous insistence that for Didcot the Oxfordshire Structure Plan had to clearly apportion the housing requirement to particular districts. If there are serious doubts whether the SDA south of Oxford is deliverable it should not be included in the Plan. Given recent statements that the Government is reducing its overall target of 240,000 new homes a year to 210,000 and the current debate about a possible eco town at Weston Otmoor, the need for additional homes on the edge of Oxford should be deleted from this plan and reassessed through the review of the South East Plan. This would also give the opportunity to fully assess whether the location chosen for development is deliverable. It is noted that SEERA's report to the regional planning committee objects to the south Oxford SDA as the preferred spatial option should be based on growth at Bicester, Didcot, Wantage & Grove and within the built up area of Oxford. However, this strategy was based on significantly lower level of development. This ability to deliver an increase in numbers in these locations and the implications for traffic accessing Oxford have not been tested, therefore no increase in housing numbers elsewhere should be made or alluded to in this Plan.*
- (o) The policy in the spatial strategy section of the plan (SP5) requires selective reviews of the Green Belt including to the south of the Oxford to accommodate an*

extension to Oxford city: by definition of it is demonstrated that land in South Oxfordshire is unsuitable, then to comply with the policy it would fall to the Vale to undertake a review of Green Belt in its area as it is the only other authority with land south of the city. Unlike land to the north of the city, the County Council has never proposed an urban extension to Oxford in this district. If the Government retains the strategic development area south of Oxford in the Plan and if subsequently a case is made that an urban extension cannot be built in South Oxfordshire, alternative locations must be considered through a review of the South East Plan. The wording of policies SP5 and CO4 should be changed to 'a selective review of Green Belt boundaries is required in the following locations'. This would mean that if the review failed in South Oxfordshire it would not follow that there should be a further review south of the city. In no other areas where a review is proposed does the South East Plan require a wider review to deliver alternative locations if the area proposed for the development is not achievable. In addition it is not reasonable for the review of the Green Belt to safeguard land for development to at least 2031 based on the rate of development proposed in the SDA to 2026. The SDA is proposed to meet the requirements of the period to 2026: what happens beyond then should be judged afresh and not simply continue the growth proposed in this plan period.

- (p) Changes in the transport section referring to prioritising transport schemes that aid delivery of the sub-regional strategy, improving the links between homes and jobs in the Didcot-Wantage and Grove corridor, and local schemes including improving the A415 and providing the Marcham bypass are welcome. However, it should be pointed out that in a relatively large and mainly rural area with only one rail station, the car will remain the dominant mode of travel.*
- (q) There should be recognition of the status of the larger market towns (such as Abingdon) in the policy or explanatory text of policies BE4 and/or CO1. They currently have the same policy approach as villages, yet they are sustainable locations that could accommodate development that meets the need of a wider area than just the needs of that community.*

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

- 3.1 This report relates to the Council's Vision and objectives A, B, C, E and F. The South East Plan is important as plans and strategies of the Council, including the Local Development Framework and the sustainable Community Strategy, must take into account.

4.0 The Key Changes to the Draft Plan for the Region as a Whole

Vision and Objectives

- 4.1 The vision for the region is being changed to 'A socially and economically strong, healthy and just south east that respects the limits of the global environment.....' This is supported by 16 objectives that replace the 21 in the draft plan.
- 4.2 **Comment** The proposed vision and objectives are clearer, more focused and more succinct than in the draft plan. Local Development Frameworks will be expected to develop locally specific objectives based on the ones in the South East Plan. This will be for the Council to consider in the preparation of the core strategy preferred options

document to be considered by Council in December this year and then published for consultation in the new year.

Spatial Strategy

- 4.3 A proposed new section, incorporating some policies from the original draft plan prepared by SEERA, sets out the over-arching spatial strategy for the region. The strategy
- defines 9 sub regions including Central Oxfordshire, 22 regional hubs including Oxford and 8 strategic development areas including south of Oxford
 - focuses development in urban areas
 - retains the broad extent of Green Belts but requires selective reviews of boundaries including south of Oxford city. Reviews will be expected to safeguard sufficient land to meet development needs to at least 2031
 - influences the shape and size of settlements and
 - establishes four key principles for sustainable rural areas.
- 4.4 **Comment** Establishing a clear spatial strategy for the region is welcome and will be helpful when preparing LDFs. However, it is considered that the focus of the Central Oxfordshire sub-region should be 'managed growth' not growth and regeneration' as proposed – see *recommendation (a)*. There are also concerns about the approach to Green Belts which will be considered more fully below in the section on Central Oxfordshire.

Cross Cutting Policies

- 4.5 With the exception of the policy for green space which is new, the other policies in this section were in the draft plan. The main changes proposed include
- the Secretary of State has not accepted the introduction of more demanding standards for the construction of new buildings than required through building control on a region wide basis
 - the reference to growth only taking place once infrastructure has been put in place is deleted, but local development documents will be expected to identify the necessary infrastructure and services required to serve the area. Policy CC7 makes it clear that where new development creates a need for additional infrastructure a programme of delivery should be agreed before development commences
 - that local authorities and partners should work together to provide substantial networks of accessible, multi-functional green space
 - the policies to protect strategic gaps between settlements and inter-regional connectivity are to be deleted.
- 4.6 **Comment** The proposed changes to the wording of the policies and explanatory text makes them clearer and more succinct. The changes to the wording moving from a general intention to a more positive approach, and changes from the extensive use of the word 'should' to 'will', put a much greater onus on the local authorities to deliver, particularly through the LDF process. While this is not unreasonable, or the individual tasks difficult in themselves, the implications for local authorities are considerable. LDFs are required to have a greater scope, give greater certainty and detail early in the process, and cover a much longer time period than the local plans they replace. The Government should not expect such plans to be delivered more quickly than old style local plans particularly in view of the need to consider all reasonable options, the much greater emphasis on a robust evidence base, limited public funds (including the

requirement for year-on-year efficiency savings), the shortage of experienced planning staff and the demands being put by all local authorities on the service providers who may be unable to respond fully in the timescales set out – see *recommendation (b)*.

- 4.7 Officers are very concerned about the deletion of the reference to growth only taking place when the infrastructure and services required are in place. While the LDF can go some way to identifying the infrastructure needed to support particular developments, it cannot ensure funding and neither can it address specific sites brought forward through the development control process. Its deletion could result in unsustainable development and a continuation of past trends of underinvestment in the region that could damage its social and economic strengths – see *recommendation (c)*.
- 4.8 Some proposed policies (such as policy C7) for the River Thames corridor set out the approach local authorities should take when preparing LDFs in the form of a list of criteria. It is regrettable that these have not been expressed as general policies that could be used to determine applications as it will necessitate policies in local development documents covering the same matters – incorporated in recommendation (a).
- 4.9 On the issue of open gaps between settlements, the Secretary of State considers that LDFs are intended to promote a proactive positive approach to managing development rather than taking a reactive approach that merely lists all the instances where development will be prevented. However, the definition of open gaps has been a recognised and well supported element of local planning policies for many years, particularly between Wantage, Grove and East Challow. Residents of Harwell village would almost certainly find a modicum of comfort if an open gap could be protected from development between the new Didcot western development area and the village. Although the policy proposed for deletion would not have applied in these cases, as it refers to settlements each with a population of 10,000 or more, the reasons why it has been deleted could make it difficult to have ‘gap’ policies at the local level. Officers consider it may be possible to define gaps for other uses – e.g. part of a green infrastructure network for formal and informal recreation between Wantage and Grove, or amenity and landscaping between Didcot and Harwell – and gaps can be taken as a constraint when assessing areas for development. In the local plan, policy G2 restricts development outside the existing settlements and allocations: a similar policy in the LDF would protect all open land on the edges of settlements. Nevertheless where gaps between settlements are small it should be for LDFs to determine whether it is appropriate to define open gaps at the local level, and the absence of a policy at regional level should not be allowed to preclude this – see *recommendation (d)*.
- 4.10 Given the location of the Vale next to the south west region and Swindon with its proposed major growth, it is regrettable that the policy is proposed for deletion. While it is accepted that it is a procedural, not a policy, matter, there should be references in the text to the need to ensure inter-regional connectivity as part of the introduction to the spatial strategy – see *recommendation (e)*.

Sustainable Economic Development

- 4.11 A new policy RE1 is proposed that requires LDFs to provide an enabling context to ensure the long term competitiveness of the region’s economy, with policies that are sufficiently flexible to respond positively to changes in the global economy. There is to

be an early review of the South East Plan to give guidance on the scale and location of the employment land and floorspace required.

- 4.12 **Comment** The policy should refer to employment land reviews being the basis for the provision of employment land. The policy appears to allow for the release of more employment land than justified by employment land reviews in response to something as ill defined as changes in the global economy. It pushes down to a local level decisions that should be made at the national or regional level and could result in speculative applications and subsequent appeal decisions leading to a significant over development of employment land in some areas in relation to the level of housing and other planned infrastructure, which would not be sustainable. The Government is abrogating its responsibilities in relation to employment. It should set out in the RSS what levels of employment development will be appropriate. Otherwise the decision over the level of development in the most important area of the UK for employment will be left up to individual Councils. This approach contradicts the early review of employment land suggested under policy RE3 – *see recommendation (f)*.
- 4.13 It is noted that policy RE5 refers to local authorities enabling businesses to operate as efficiently as possible in relation to movement. There should be recognition that the means to effect improvements in movement lie outside the hands of local authorities and are the responsibility of Government. Councils cannot improve the capacity of trunk roads, motorways or railways. Without Government support on this aspect Councils cannot operate this policy – *see recommendation (g)*.

Housing

- 4.14 The key changes include
- the rate of house building in the region is increased from 28,904 a year over the 20 year period to a minimum annual average of 33,125, giving a total of at least 662,500 new homes
 - the figure for the Vale is increased only very slightly to a total of at least 11,560 new homes by 2026 (from 11,500 in the draft plan). This represents an annual average of 578 dwellings per year.
 - the numbers given are the minimum required as the Government considers that even with the increases proposed the housing provisions are too low. In preparing local development documents councils are expected to test higher levels of housing, assess accelerating the rate of delivery at new growth points, test the longer term issues arising from eco-towns and plan for an upward trajectory of housing completions.
- 4.15 **Comment** While the very small increase in the housing requirement for the Vale is welcome, officers are very concerned as to how the housing figures, which are the minimum to be provided, will be treated particularly at the examination in public and planning appeals. It would appear that development proposed significantly in excess of the annual provisions could be seen to be in general conformity with the South East Plan. This approach undermines local authorities' ability to deliver sustainable development in line with infrastructure provision, and fails to give certainty to communities, service providers and developers. This is compounded by the approach in H3 'Housing' which does not allow local development documents to make an allowance for windfall sites which have been a major component of land supply for many years. Furthermore, at a recent core strategy examination, the question was raised as to whether over provision in one year could count towards the overall requirement. It would be perverse if districts that built more houses than required in

any one year had to identify additional land if the over provision could not be taken into account, and would make forward planning over a 20 year period virtually impossible. As yet no clarification has been received from Government, but the wording of policy H1 to provide a 'minimum annual average' does not give comfort or the degree of certainty a plan led system should provide. The requirement to plan for an upward trajectory of housing completions would seem to necessitate a year on year increase in completions in all areas of the South East which is inconsistent with a single annual requirement for each area. It is not at all clear how local authorities are to test the longer term issues arising from eco-towns through emerging LDFs when so little is known about them – this should be something the Government takes into account when it assesses whether particular proposals should be pursued – see *recommendations (h) and (i)*.

Natural Resource Management

- 4.16 The proposed changes include a reference making it clear that the Upper Thames Reservoir is in Oxfordshire. The relevant part of the policy reads 'Strategic new water resource options that may be required to be operational over the plan period include: i Upper Thames reservoir, Oxfordshire by 2019/20'.
- 4.17 **Comment** Thames Water's draft water resource management plan has not demonstrated the need for a reservoir on the scale proposed. In its comments on the draft water resources management plan the Environment Agency states 'We cannot support the company's preferred planning solution including the proposed reservoir until it has provided the evidence that shows it has fully explored all alternative demand management and supply options'. If the reservoir is not required to be as large as currently proposed there may be no need for it to be located in Oxfordshire. The geographic reference should therefore be removed – see *recommendation (j)*.

5.0 The Key Changes to the Policies for Central Oxfordshire and the Rest of the Vale

- 5.1 The policies are reordered for consistency with other chapters. The key changes include
- references to improving self containment in Bicester, Didcot and Wantage/Grove (policy CO1)
 - an annual average building rate of 2,034 dwellings a year (from 1,700) including the south Oxford strategic development area (4,000 over 20 years) and higher rates of growth at Didcot and Oxford as previously proposed under the new growth points bid. A decrease is proposed in the Vale (-260 dwellings from a total of 10,500 in the draft plan to 10,240) (policy CO3)
 - the footnote to the policy states 2,750 of the Vale's housing requirement to 2026 are to be located at Didcot and the explanatory text refers to 3,400 homes at Wantage/Grove (i.e. no change from the Panel's report) (policy CO3 and para 22.13)
 - a selective review of Green Belt boundaries is proposed on the southern edge of Oxford to facilitate an urban extension to the city. If overwhelming evidence demonstrates the unsuitability of the initial area of search, the Central Oxfordshire authorities are to ensure that a wider review (the form and extent of which will be agreed with GOSE) takes place in order to deliver one or more alternative suitable locations by 2026 (para 22.20)
 - the explanatory text states that while there is a degree of flexibility associated with the housing figures 'local authorities must in the first instance seek to deliver their sub-regional allocations within their part of Central Oxfordshire' (para 22.15)
 - at least 40% of all new housing should be affordable (50% in the draft plan) (policy CO1)

- the explanatory text is to be changed to expand the reference to East-West rail and emphasise the transport links between jobs and homes by all modes within the emerging Didcot and Wantage/Grove growth corridor
- the policy on infrastructure is deleted as it repeats a policy in the region-wide section, but changes are proposed to the explanatory text including references to the need to align the pace of development with the provision and management of infrastructure
- outside Central Oxfordshire the Vale is to provide 1,320 homes over the 20 years (1,000 in the draft plan) (policy AOSR1).

- 5.2 **Comments** While the objective of improving self containment of towns is generally supported, the plan must recognise the inter-connectiveness of much of Central Oxfordshire. For example, Oxford provides employment for people living in other parts of the county, and much of the employment for Didcot and Wantage/Grove will be provided at Milton Park and Harwell. Although the plan would enable more employment at Wantage/Grove, which would be welcome, the plan should seek the self containment of the Quadrant area as a whole and not the individual settlements – *see recommendation (k)*.
- 5.3 The redistribution of some dwellings from the Central Oxfordshire part of the Vale to the rest of the district, although small is welcome. However, members should be aware that the figures are the minimum that should be built – *see recommendation (l)*.
- 5.4 The Government has justified the southern extension to Oxford into the Green Belt as there is a ‘regional imperative to deliver higher housing numbers and economic growth’ and a ‘lack of realistic alternatives to focussing growth at Oxford’. Officers consider that the regional imperative to deliver higher housing numbers could be met elsewhere in the South East on land not designated as Green Belt and therefore this is not an exceptional circumstance that should over-ride Green Belt policy. Furthermore the Weston Otmoor eco-town as proposed would provide housing linked to Oxford by a fast, free and frequent public transport service. Alternatives to growth at Oxford, are, therefore, being assessed – *see recommendation (m)*.
- 5.5 Officers are concerned by the statements (para 22.20 of the plan as proposed to be changed) that if the urban extension cannot be located south of Oxford, the Central Oxfordshire authorities should deliver one or more alternative suitable locations, and local authorities are required to respond to the housing figures with a degree of flexibility. There is no guidance on who will be arbiter to judge whether the land south of Oxford is unsuitable for development and less suitable than any alternatives suggested. It is naïve to assume that the local authorities would agree alternative locations where the 4,000 homes proposed for this area would be located. Even if agreement could be reached it is difficult to see how this could be tested at examination – which could involve two or more different LDFs and would seriously prejudice public involvement in the process. Such proposals would not be in general conformity with the plan and legal challenges could result. The desire for flexibility, while understandable to achieve the building rates proposed creates considerable uncertainty and may affect delivery. Furthermore it is not consistent with the Government’s previous insistence that for Didcot the Oxfordshire Structure Plan had to clearly apportion the housing requirement to particular districts – *see recommendation (n)*.
- 5.6 The policy in the spatial strategy section of the plan (SP5) and policy CO4 requires selective reviews of the Oxford Green Belt to the south of the city: by definition if it is demonstrated that land in South Oxfordshire is unsuitable, then to comply with the policy it would fall to the Vale to undertake a review of Green Belt to accommodate the urban

extension as it is the only other authority with land south of the City. Unlike land in Cherwell, the County Council has never proposed an urban extension to the City in this district. It is considered that if it is demonstrated that an urban extension cannot be built in South Oxfordshire, alternative locations must be considered through a review of the South East Plan. The wording of policies SP5 and CO4 should be changed to 'a selective review of Green Belt boundaries is required in the following locations'. This would mean that if the review failed in South Oxfordshire it would not follow that there should be a further review south of the city. In no other area where a review is proposed does the South East Plan require a wider review to deliver alternative locations if the area proposed for development is not achievable. In addition officers consider that it is not reasonable for the review of the Green Belt to safeguard land for development to at least 2031 based on the rate of development proposed in the SDA to 2026. The SDA is proposed to meet the requirements of the period to 2026: what happens beyond then should be judged afresh and not simply continue the growth proposed in this plan period – *see recommendation (o)*.

- 5.7 The changes referring to prioritising transport schemes that aid delivery of the sub-regional strategy, improving the links between homes and jobs in the Didcot and Wantage/Grove corridor and local schemes including improving the A415 and providing a Marcham bypass are welcome. Table 7 of the transport section (which refers to access to other towns in the Central Oxfordshire sub region as a priority for the regional funding allocation post 2016) is welcome. However, it should be pointed out that in a relatively large and mainly rural area with only one rail station, the car will remain the dominant mode of travel – *see recommendation (p)*.
- 5.8 Policy CO1 identifies the main locations for development as Bicester, Didcot and Wantage/Grove: elsewhere development will be permitted to support the social and economic wellbeing of local communities. This raises concerns as to the role of Abingdon – our main settlement as it would appear that development that was of a larger scale than needed to support the town's social and economic wellbeing would not be in conformity with the South East Plan. There is also a policy void in the general policies in the plan for such towns: Abingdon is not a primary or regional centre (unlike Oxford and Banbury) identified in policy TC1. The only other policy – BE4 (the role of small rural towns) refers for example to LDFs providing sufficient housing development to meet identified needs. There should be some recognition in the explanatory text that in the local context that market towns such as Abingdon (which are larger than generally referred to in policy BE4) are sustainable locations that could accommodate development that meets the needs of a wider area rather than just the needs of that community – *see recommendation (q)*.

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