

Listening Learning Leading

**JUNE 2020** 

# HEARING STATEMENT MATTER 5

**Spatial Strategy** 



### Question 5: Is the spatial strategy sound?

#### **Council Response:**

- 1. Yes, the spatial strategy is sound. The strategy involves focussing development at Science Vale and sustainable settlements (which includes towns and larger villages), together totalling 70% of the new housing. The strategy evolves the Core Strategy (<u>ALP02</u>) 'network of settlements' approach with development at Science Vale and development next to the neighbouring major urban area of Oxford to help meet Oxford's unmet need.
- Rather than following a single conceptual model (e.g. all in Science Vale, all growth in a single new settlement) the strategy takes the strongest elements of available options to blend into a package which is both balanced, logical and pragmatic.
- 3. We have combined the most sustainable elements of the options to create a spatial strategy which unlocks the economic growth potential of Science Vale, protects the vitality and sustainability of the market towns and larger villages and seeks to limit the amount of development in the Green Belt.
- 4. The strategy has been shaped by iterative processes of Sustainability Appraisal (SA) (CSD04.2) and consultation, coupled with working to ensure deliverable allocations and infrastructure improvements.
- 5. By directing a proportion of development to towns and villages, we are providing the opportunity for communities to make important decisions through neighbourhood plans and generate income and investment from CIL for their local areas. Growth is delivered across the whole district rather than directed again to the main towns, but targeted to ensure the right developments are in the right places.

Question 5a: Is the plan's spatial strategy an appropriate strategy for meeting housing, employment, community and other needs in the right places whilst protecting the environment?

- 6. Yes, the spatial strategy is an appropriate one which balances meeting development needs with protecting the environment.
- 7. The district has many valued environmental assets: two nationally protected AONB landscapes; the River Thames corridor; nationally and internationally protected biodiversity sites; a rich historic environment of market towns and picturesque villages; and archaeology from iron-age hillforts to Roman settlements and Civil War battlefields. All of the district's most valued environmental assets will remain once the growth and strategic allocations proposed in the Plan have been delivered. The Plan protects these assets whilst delivering the development the district needs. The strategy meets the Plan's vision: South Oxfordshire will remain a beautiful place.
- 8. The spatial strategy has sought to direct the housing and employment development to locations which are less protected in terms of national environmental assets. Whilst the Plan places heavy reliance on large scale release of Green Belt land (covered in Matter 6), Green Belt is land which serves particular purposes and is not designated for its intrinsic environmental value.
- 9. That said, there are some strategic sites which do overlap with higher level ecological or heritage assets (e.g. STRAT14), or could affect such assets nearby (e.g. STRAT13) and where this is the case the policy and wider plan provide safeguards for the ongoing protection and safeguarding of that asset.
- 10. Large scale development provides economies of scale. It also gives scope to trigger significant investment and deliver significant infrastructure

improvements (transport, education etc.) as well as creating mixed-use sustainable communities.

- 11. The bulk of the new growth in the Plan is to be delivered through strategic allocations, with a lesser amount through allocations in neighbourhood plans, windfalls and other committed and completed schemes (see Table 5c in the Plan, as updated). There are protective policies and provisions in the Plan¹ to ensure that the remainder of the growth, not delivered through strategic allocations, can be located sensitively and developed in a way that protects local character and delivers net gains for communities (e.g. through CIL receipts to fund local facilities) and for biodiversity. In this way, the plan protects the district's environment.
- 12. The Spatial Strategy Topic Paper (TOP04) sets out the evolution of the proposed spatial strategy and shows how it has been refined through the different stages of plan making. The SA (CSD04.2) demonstrates that the strategy is appropriate. Section 5 of the SA contains the appraisal of reasonable alternatives for the spatial strategy, assessing the following options:
  - a) Core Strategy approach: 55% of homes at Didcot, of the remainder 60% to market towns and 40% to the larger villages;
  - b) Science Vale and 'sustainable settlements': Focus on Science Vale area (60%) with the remainder across 'sustainable settlements' (40%) (likely to be Thame, Wallingford, Henley and some less constrained larger villages e.g. Benson, Berinsfield, Chalgrove, Chinnor, Cholsey, Crowmarsh Gifford, Sonning Common and Watlington);
  - c) All in Science Vale: All additional housing in Science Vale;
  - d) All in a single new settlement: All additional housing in a single new settlement in the area of the district which is not in the Green Belt or Areas of Outstanding Natural Beauty;

<sup>&</sup>lt;sup>1</sup> In the environment policies (ENV1-12) environmental protection and pollution policies (EP1-5) and design policies (DES1-DES11)

- e) Dispersal: Make land allocations for new homes at all towns, larger and smaller villages, and introduce a more permissive approach to infill development in the smallest villages (but still not hamlets or open countryside;
- f) Next to neighbouring major urban areas (Reading/Oxford): The rural district lies immediately adjacent to the major town of Reading and the City of Oxford. One option would be to put South Oxfordshire's housing growth on the edge of these neighbouring urban areas;
- g) Raising densities (from 25dph): More growth could be contained within a smaller area of land by encouraging higher densities in new development. The current policy, Core Strategy policy CSH2, sets a minimum of 25 dwellings per hectare, which is quite a low density; and
- h) Locating development in settlements where it could help fund projects: By the community taking housing development, the Council and County Council can require housebuilders to contribute towards infrastructure projects. These could be, for example, a new road, a new river bridge, or a new or expanded school.
- 13. The Plan's spatial strategy directs a proportion of growth to the district's towns and villages and the Plan promotes these site choices being made through neighbourhood plans. The Council is a strong supporter of neighbourhood planning, with a specialist team of planning policy officers to support communities preparing plans. South Oxfordshire was at the forefront of the system, with two frontrunner neighbourhood plans (Woodcote and Thame, the latter won the RTPI's Planning for Excellence Award in 2013 for plan making). We encourage local communities to take the lead in shaping where new development takes places, with the role of the Local Plan being to provide strategic policies and housing numbers for communities to plan for. We welcome the local knowledge and commitment of communities, which has resulted in South Oxfordshire having an impressive 17 made neighbourhood

plans and a further 29 underway<sup>2</sup>. The Local Plan provides effectively for the next phase of neighbourhood plans in the district (including those now on their second round of plans) through policies H3, H4 and H5. They are a proven model in South Oxfordshire, with many communities benefitting from capacity-building that neighbourhood planning brings and the 25% CIL receipts to invest on improving local facilities and infrastructure. Experience from the Core Strategy shows that most communities undertaking neighbourhood plans have not shied away from planning for development in their plan, with for example some smaller villages seeking to plan for a slightly larger amount of growth than the Plan asks. This is why the submission Plan has provided new scope for this at Policy H1, para 3(iii) and (iv).

- 14. Generally, we have received a significant level of support for the spatial strategy, although some felt there should be more focus on development at Didcot or Oxford, and many objected to particular locations (see Local Plan para 1.24 and Regulation 22 Statement (CSD11) paragraphs 4.31- 4.38).
- 15. The evolution of the spatial strategy is set out in the Spatial Strategy Topic Paper (TOP04). The strategy in the last three local plans directed the bulk of the district's new greenfield development to Didcot, which received significant growth and transformation through allocations in the SOLP 2011 (ALP01) and the Core Strategy (ALP02), and is, in effect, saturated until transport infrastructure is improved through delivery of road proposals in the Housing Infrastructure Fund agreement (HIF) (see Matter 10 and HIF announcement³). This Plan therefore broadens out the focus on Didcot to foster development at other sustainable locations in Science Vale, which have good opportunities for sustainable living blending jobs, housing, new facilities and sustainable transport. The strategy supports the growth and development of Didcot Garden Town and supports Science Vale, recognising that Science Vale forms the

<sup>&</sup>lt;sup>2</sup> A map of neighbourhood plan coverage is kept up to date at <a href="http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/neighbourhood-plans">http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/neighbourhood-plans</a>, current version June 2020

<sup>&</sup>lt;sup>3</sup> https://news.oxfordshire.gov.uk/oxfordshire-county-council-awarded-218m-in-funding-from-homes-england/, June 2020

bookend of the Ox-Cam arc and is of national importance for the economy and innovation.

- 16. At the time of the SOLP 2011 (ALP01), the housing requirements were smaller (8,000 homes from 1996-2011) and aside from two greenfield sites at Didcot, all the Plan's allocation could be accommodated on previously developed sites in the market towns and larger villages. For the Core Strategy, and now again the emerging Local Plan 2035, the Brownfield Land Register (HOU10) and SHELAA (HOU01) did not yield enough previously developed sites to accommodate the now higher housing requirements, triggering the need for well-chosen greenfield allocations to supplement the previously developed sites (Chalgrove Airfield, Oxford Brookes University). The emerging Plan gave weight to making as much use as possible of brownfield land (NPPF para 117) and the Council encouraged Oxford City to accommodate all possible housing within Oxford, before accepting unmet needs and locating these in the Green Belt (NPPF para 137).
- 17. The Plan's approach to employment is to locate new employment where existing employment is, or to deliver it alongside new strategic housing and infrastructure. The Plan brings housing to support the employment in Science Vale, providing opportunities for reduced commuting and enabling sustainable lifestyles. On retail, our approach is firmly to keep retail in main town centres rather than out of town and to protect and sustain village services, while also providing local centres for daily needs at the new strategic allocations to enhance these communities and promote sense of place.
- 18. Climate change (see objective 8 of the Plan and matter 8) has been a factor in deciding the Plan's strategy, although it is, of course, not the only consideration steering decision making. Mitigation around climate change has been addressed by influencing the location of development (NPPF para 103 and 150), recognising the County Council's advice on the economies of scale that larger developments yield more infrastructure and provide more scope for delivering (and sustaining) sustainable modes of travel. Greener growth will be achieved through the Plan's policies for sustainable design and construction,

optimised densities, combined heat and power, flood risk management and net gain for biodiversity. Flood risk as a constraint has influenced both the spatial strategy and site selection. The new addition of carbon reduction provision in the Plan (see modifications to STRAT1 and the addition of policy DES11) will help secure this.

- 19. The spatial strategy meets needs in the right places. The SA (CSD04.2) sets this out by comparing and examining the spatial distribution options tested. It demonstrates that the main locations for growth generally perform well. Together, they form a coherent package which deliver the overall long-term sustainable development of the district. Drawing on a combined approach for the distribution of development enables a series of benefits to be delivered through the Plan and for those benefits to be shared more widely across the district, including in those areas which historically have seen a low level of investment. It does this whilst ensuring that the housing need of the district can be accommodated and delivered in the plan period. Importantly, this combination ensures that the overall strategy is more deliverable and helps to reduce the pressure on areas that received strategic growth in the Core Strategy, particularly Didcot and the Market Towns.
- 20. Early in the Plan's preparation process it became clear that a significant number of homes would be delivered through neighbourhood plans being prepared by Town and Parish Councils. Given this, the Council focussed its search on larger, more strategic development sites. The level of growth that could be considered by Town and Parish Councils through the neighbourhood planning process had been explored during the examination of the Core Strategy and the Inspector concluded that the 775 homes allocated to Thame was an appropriate number for the community to consider through the neighbourhood planning process.
- 21. The development of the spatial distribution strategy has been a thorough process. As explained in the Site Selection Background Paper Part 1 (TOP06), in May 2018, the Council followed Cabinet's recommendation to re-assess all available housing sites to ensure the best possible outcome for delivery of

housing to meet the needs of the district. This included: those currently proposed in the Publication Version Local Plan; those previously considered but later dismissed; and additional sites that were submitted to the Council prior to the close of the Regulation 19 publication. At the same time the threshold of 1,500 units for strategic sites was reduced to 500 in the light of constraints in the district, which widened the search and allowed re-consideration of less constrained sites previously discounted on capacity grounds.

- 22. This Plan takes significant and difficult decisions which will secure a land supply and set the district up well for meeting growth needs in years to come. Many of the strategic allocations will deliver beyond the Plan period. The focus on large strategic allocations in Science Vale and the edge of Oxford, coupled with inscale expansion of the market towns and larger villages, is an appropriate balance for meeting needs in a way that protects what is special about South Oxfordshire.
- 23. We have planned positively, met the development needs of our area as well as unmet needs from a neighbouring district (NPPF para 11). We have set out through STRAT 1 and the other STRAT policies an overall strategy and provision for different types of development (NPPF para 20), as well as establishing the parameters for future neighbourhood plans (NPPF para 21). Opting for larger scale allocations, including urban extensions, will benefit infrastructure delivery, realise the area's economic potential and help create sustainable communities (NPPF para 72).
- 24. With the recent COVID-19 there is uncertainty about what the effects might be and how long they will last. This is not a reason to halt the Plan. The Plan is sufficiently flexible to address changes in lifestyle (e.g. home working, home delivery) and the Infrastructure Delivery Plan (IDP, PSD27) is a living document which can be updated to address changing priorities e.g. greater emphasis on walking and cycling. Similarly, the housing mix and Design Guide can be updated as necessary and the Plan refers to these. However, we do propose some modifications to address COVID-19, through a new paragraph of supporting text in the introduction to the Plan, changes to the density policy to

allow for design around home working and garden space and a new exceptional circumstance related to economic resilience in our statement on Matter 6 (Green Belt).

# Question 5b: Are the strategic allocations well-chosen and in the right locations?

- 25. Yes, the strategic allocations are soundly based and meet the Plan's spatial strategy. There is a robust evidence base for their selection, with a clear audit trail of SA and other evidence to show why these were taken forward as the most sustainable allocations in comparison with reasonable alternatives.
- 26. The sites are well chosen. The process is documented in the Strategic Site Assessment Background Paper (TOP06 and TOP06.1) and SA (CSD04.2 and CSD04.3). The site selection methodology evolved from work and evidence gathering that had been conducted over the previous five years. We obtained advice from the Planning Advisory Service about the draft methodology for this process. In June 2018, the Planning Inspectorate provided further informal input to the methodology and officers are confident that the methodology applied is robust and in conformity with Planning Practice Guidance. The Strategic Site Selection Background Paper Part 2 (TOP06.1) assessed potential strategic sites against the Plan's emerging spatial strategy, informing and informed by the SA of Strategic Sites, presented in Section 7 of the SA Report (CSD04.2). Consideration was given to whether there would likely be any inconsistencies between the allocation of a site against the strategic objectives and the previous preferred distribution of development within the district. As well as supporting investment in neglected parts of the district, the spatial strategy and allocations mutually achieve significant sustainability benefits for the district.
- 27. Consultation has taken place multiple times on the strategic sites. When Members asked officers to carry out a thorough review of site choices in May 2018 to set out the advantages and disadvantages of different site options, the

root and branch review yielded the same answers on the best sites, as well as a new ranking system to aid site selection. By this stage, the Council had accepted to take a proportion of Oxford's unmet needs and some edge of Oxford sites were added to address those needs.

- 28. The selection of strategic sites falls under this matter. Testing whether the Plan adequately lays the framework for their sustainable development falls under the individual sessions for each site (Matters 11-16). We summarise here the reasons for the site choices. Our hearings statements for Matters 11-16 explore how the policy wording addresses all the specific matters needed for the delivery phase. Further work will be undertaken through the masterplanning, pre-application and development management stages, which will require site promoters to do the work as set out in STRAT4 (on landscape, ecology, transport, flood risk, archaeology, heritage etc), as well as working with the County Council and infrastructure providers to implement the Infrastructure Delivery Plan (IDP) (PSD27).
- 29. The new strategic allocations fall into three groups, which characterise why they are well chosen and in the right location:

Large previously developed sites: Chalgrove Airfield, Culham Science Centre and Land at Wheatley Campus. These provide for the efficient reuse of land (NPPF para 117) and it is their previous uses which make them strong choices, coupled with their locational advantages. Culham Science Centre falls within Science Vale and has a railway station. Chalgrove Airfield and Wheatley Campus adjoin larger villages and have access to the services and facilities of those local centres. They will benefit from the established community structures, character and sense of place of these villages. They can also provide new jobs, facilities and open space to benefit the existing villages. Chalgrove Airfield and Culham are planned at a scale which will unlock a substantial infrastructure package, providing a choice of transport modes and enhancing services for existing communities (NPPF para 72 and 103).

- Science Vale sites: Culham Science Centre (which also falls in the brownfield category above), the land adjacent to Culham Science Centre and Berinsfield. Science Vale is a key focus for growth and change (employment, housing, infrastructure) but with Didcot at transport capacity, a wider search around Science Vale and near to employment sites was needed. The Culham and Berinsfield sites will provide homes near existing jobs and help bring further investment and success to Science Vale. The allocation at Berinsfield will help deliver much needed regeneration. It will transform Berinsfield into a Garden Village, re-balancing the housing mix and letting it fulfil its potential as a place of opportunity within Science Vale, while protecting its popular green centre as a Local Green Space for the community.
- Edge of Oxford sites: Grenoble Road, Northfield and Land North of Bayswater Brook. These will provide housing for Oxford's unmet need, so should be close to Oxford where that need arises. They address the agreed need apportioned to South Oxfordshire, providing all the 4,950 homes. They provide long term construction projects with a tail of delivery into the next Plan period, meaning that such Green Belt releases may not need to be made again in the foreseeable future.
- 30. We now go through each strategic allocation to summarise why they are well-chosen and in right location. For full details please see the two-part Strategic Site Selection Background Paper (TOP06 and TOP06.1), particularly the 'reasons for recommendation' table 6, page 35-36), and the SA (CSD04.2). The Call for Sites and SHELAA (HOU01) provided the starting point for investigating sites. The Council's Matter 11-16 hearing statements provide further details on how the strategic allocations would be delivered to achieve sustainable developments.

#### Large previously- developed sites

# Land at Chalgrove Airfield

- A. Well-chosen and in the right location because:
  - In the central portion of the district which is least constrained: neither Green Belt nor AONB
  - Predominantly previously-developed land
  - Adjacent to a larger village, Chalgrove
  - Adjacent to Monument Business Park, one of the district's established employment centres
  - Flat and largely free from constraints
  - Compatible with retaining existing employment use on the northern part of the airfield (Martin Baker Aircraft Company Limited).
  - Brings investment in infrastructure and vitality to services and facilities
  - A large enough allocation to deliver significant infrastructure improvements
  - Opportunity to improve connectivity with the rest of the district by delivering public transport and highways improvements in an area where sustainable transport choices are currently limited
  - Delivers a new all-through secondary school for this part of the district, by providing a new site for a re-located lcknield Community College at Watlington (which currently has no sixth form, not enough space to expand, and school facilities that are in a poor state).
  - Opportunity for the site to contribute to the delivery of a bypass at Watlington that will have positive impact by redirecting traffic away from the AQMA in the centre of the village.
  - Opportunity to resolve surface water run-off in the existing village.
  - The role of Homes England and ability to deliver site in a timely manner
- B. Main site-specific points to address through the comprehensive masterplan, preapplication and application process:
  - Protection of the site of the Civil War Battle of Chalgrove Field (a Registered Historic Battlefield)
  - Arrangements between site owner Homes England and leaseholders Martin Baker Aircraft Company Limited
  - Addressing traffic in Watlington's Air Quality Management Area
  - Delivering necessary transport infrastructure including a re-aligned B480 and off-site road improvements (village bypasses or edge roads)
  - Delivering community infrastructure, green infrastructure and a net gain for biodiversity

- Improve walking and cycling links locally to existing settlement and employment
- Achieving development that is integrated and relates closely to the existing settlement of Chalgrove
- Addresses impact on long distance views from the Chilterns Hills AONB.
- C. Does the plan provide the policy framework to address site specific points at B?
  - Yes, through STRAT4, the criteria in STRAT7 and other relevant policies of the Plan (e.g. ENV10 on historic battlefields)

# Land at Wheatley Campus, Oxford Brookes University

- A. Well-chosen and in the right location because:
  - Predominantly previously-developed land, with existing use relocating
  - Adjacent to a larger village, Wheatley
  - Adjacent to one the district's main secondary schools, Wheatley Park
  - Close to Oxford assessible by cycling and buses as well as the adjacent A40
  - Removal of ten-storey grey concrete tower block resulting in a significant landscape benefit for the area
- B. Main site-specific points to address through the comprehensive masterplan, preapplication and application process:
  - Improving transport, including bus provision and cycle links to Oxford
  - Protecting assets including TPO specimen trees, tree avenue and tree groups
  - Protecting a scheduled monument on site and surrounding listed buildings (e.g. the former deer park to Holton Park)
  - Minimising visual impact on the countryside
  - Maintaining the play pitch provision
  - Delivering community infrastructure, green infrastructure, compensatory improvements for the loss of Green Belt, and a net gain for biodiversity
- C. Does the plan provide the policy framework to address site specific points at B?
  - Yes, through STRAT4, the criteria in STRAT14 and other relevant policies of the Plan (e.g. CF4 on playing pitches)
  - Already has outline planning consent (granted on appeal April 2020)

#### Science Vale Sites

# **Culham Science Centre and Land Adjacent to Culham Science Centre**

- A. Well-chosen and in the right location because:
  - In Science Vale where there is strong strategy for economic growth (and now potential for economic recovery)
  - Site is at outer edge of Oxford Green Belt does not make a significant contribution to the Green Belt purposes of checking sprawl and protecting the special historic setting of the City
  - Culham Science Centre is previously-developed land
  - Providing homes (STRAT9) next to jobs (STRAT8) and creating a sustainable mixed-use community
  - Existing location for world class science and innovation, of international importance to foster
  - Chance to create attractive modern campus style workplaces with housing, facilities, leisure and public transport in a high- quality rural setting
  - Opportunity to redevelop outdated building stock on the Science Centre and Number 1 sites and intensify land uses
  - Opportunity to implement new technologies like clean heat and power generation and autonomous vehicles.
  - Existing railway station at Culham with short hop to Oxford station or Didcot
  - Potential wider benefits to surrounding villages from the future enhancement of the station/frequency of rail services
  - Easy cycling distance of Abingdon with its services and facilities; the new population would help market town vitality
  - Complements a large agreed package of Government funding for infrastructure, including once-in-a-generation investments for the area (like the new River Thames crossing at Culham linking to Didcot Garden Town) which is also needed for sites allocated in the adopted Vale Plan
- B. Main site-specific points to address through the comprehensive masterplan, preapplication and application process:
  - Protecting ecological assets including Culham Brake SSSI, BAP priority habitats close to the site and the heritage assets including listed Culham station and bridges, Schola Europaea, and the nearby Nuneham House Registered Park and Garden
  - Exploring the historic significance of existing buildings on the Science Centre and planning accordingly
  - Planning for the openness of surrounding Green Belt, understanding landscape character to create limited through-views and a permanent defensible edge, that preserve and enhance important footpaths (Thames Path and Green Belt Way)

- Delivering necessary transport infrastructure including utilising the HIF funding to build a new river crossing, Clifton Hampden bypass and improvements to public transport (including railway station improvements)
- Delivering community infrastructure while not impacting on the viability of existing centres
- Maintaining floodplain storage on the northern part of the site
- Delivering green infrastructure (including improving access from Abingdon to the Green Belt Way, Culham Station and other local footpaths and cycleways), compensatory improvements for the loss of Green Belt, and a net gain for biodiversity
- Avoiding building beneath the power lines
- C. Does the plan provide the policy framework to address site specific points at B?
  - Yes, through STRAT4, the criteria in STRAT8 & 9 and other relevant policies of the Plan (e.g. ENV2 on biodiversity)

#### Land at Berinsfield

- A. Well-chosen and in the right location because:
  - In Science Vale where there is strong strategy for economic growth (and now potential for economic recovery)
  - Places new homes near jobs in Science Vale and creates new jobs
  - Offers specific benefits which will not be delivered by developing elsewhere
  - Berinsfield has been identified as one of the Government's Garden Villages, so funding and assistance are available for planning and delivery
  - Regenerating one of the most deprived communities in the district the village scores highly on the Indices of Deprivation (2019) including measures of income, employment, education, skills and training
  - Assisting with re-balancing the tenure mix at Berinsfield, which because of its origins as a new village designed in the 1960s era of town planning, has high proportion of homes for social rent
  - Opportunity to improve run down community facilities in Berinsfield
  - Plans are generally supported by the community
  - Site is at outer edge of Oxford Green Belt does not make a significant contribution to the Green Belt purposes of checking sprawl and protecting the special historic setting of the city
  - Complements a large agreed package of Government funding for infrastructure, including once-in-a-generation investments for the area (like the new River Thames crossing at Culham linking to Didcot Garden Town)
- B. Main site-specific points to address through the comprehensive masterplan, preapplication and application process:
  - Ensuring the development leads directly to and funds completely the implementation of a masterplan for the regeneration of Berinsfield
  - Delivering necessary transport infrastructure including contributions towards wider HIF package of transport improvements
  - Delivering community infrastructure without drawing spend away from the existing centres
  - Delivering green infrastructure, compensatory improvements for the loss of Green Belt and a net gain for biodiversity
  - Ensuring known and potential archaeology informs the site layout
  - Maintaining key views to and from the AONBs, a permanent defensible edge to protect the Green Belt and permanent openness between Berinsfield and the nearby village of Drayton St Leonard
- C. Does the plan provide the policy framework to address site specific points at B?
  - Yes, through STRAT4, the criteria in STRAT10 as proposed to be modified (PSD05, mod no.4) and other relevant policies of the Plan (e.g. CF2 supporting the development of new or extended community facilities)

#### **Edge of Oxford sites**

#### Land South of Grenoble Road

- A. Well-chosen and in the right location because:
  - An urban extension to Oxford to help meet Oxford's unmet needs
  - Oxford's facilities, opportunities and employment are relatively assessible
  - Supports opportunities for sustainable living, developing in locations which reduce the need to travel
  - Adjacent to one of Oxford's main modern employment campuses, ideally located to expand the Oxford Science Park
  - Close to leisure and entertainment facilities (football, cinema, bowling, bingo, children's play etc) at the Kassam Stadium complex
  - Limited relationship in Green Belt terms with the historic areas of Oxford
  - Providing a new Park and Ride on the site will assist in reducing traffic in Oxford (the whole city is designated an Air Quality Management Area)
  - Supports the business case for the reopening of the Cowley Branch Line with a station at the Science Park, providing a direct rail link from this part of south eastern Oxford to the City centre at Oxford Station
  - Contributing to the regeneration of nearby Blackbird Leys, one of Oxfordshire's most deprived neighbourhoods
- B. Main site-specific points to address through the comprehensive masterplan, preapplication and application process:
  - Mitigation measures to maintain separation and a permanent sense of openness between the site and nearby South Oxfordshire villages
  - Creating a strong defensible edge to Oxford
  - Respecting the setting of a listed farmhouse
  - Odour from the sewage treatment works
  - Designing a layout that addresses existing pylons and provides a new wooded buffer to the large electricity substation on the site
  - Delivering necessary transport infrastructure including a Park and Ride, cycling and walking, buses
  - Delivering community infrastructure, green infrastructure, compensatory improvements for the loss of Green Belt, and a net gain for biodiversity
- C. Does the plan provide the policy framework to address site specific points at B?
  - Yes, through STRAT4, the criteria in STRAT11 and other relevant policies of the Plan (e.g. ENV11 on potential receptors of pollution including odours)

#### Land at Northfield

- A. Well-chosen and in the right location because:
  - An urban extension to Oxford to help meet Oxford's unmet needs
  - Accessibility to Oxford's facilities, opportunities and employment
  - Adjacent to a large employment area (Unipart factory) and housing
  - Jobs, shopping, leisure and entertainment within reasonable proximity
  - Supports opportunities for sustainable living, developing in locations which reduce the need to travel
  - Synergies with STRAT11 Grenoble Road
- B. Main site-specific points to address through the comprehensive masterplan, preapplication and application process:
  - Mitigation measures to maintain separation between Oxford and nearby rural village of Garsington
  - Creating a strong defensible edge to Oxford, maintaining views of Oxford City and protecting the more sensitive areas of landscape to the east of the site
  - Designing a layout that addresses existing pylons
  - Delivering necessary transport infrastructure including cycling and walking, bus services and engineering works to improve the B480 for buses
  - Delivering community infrastructure, green infrastructure, compensatory improvements for the loss of Green Belt and a net gain for biodiversity
- C. Does the plan provide the policy framework to address site specific points at B?
  - Yes, through STRAT4, the criteria in STRAT12 and other relevant policies of the Plan (e.g. ENV1 on the landscape and countryside)

#### **Land North of Bayswater Brook**

- A. Well-chosen and in the right location because:
  - An urban extension to Oxford to help meet Oxford's unmet needs
  - Oxford's facilities, opportunities and major employment are relatively assessible, including Oxford Brookes University at Headington and Oxford's three large hospitals
  - Potential to support sustainable travel by walking and cycling and well positioned to connect with public transport provision
  - Adjacent to Oxford City's new build urban extension of Barton Park
  - Near Barton, one of Oxfordshire's most deprived neighbourhoods with opportunities for improving facilities for Barton residents.
- B. Main site-specific points to address through the comprehensive masterplan, preapplication and application process:
  - Safeguarding the sensitive ecology of nearby Sidlings Copse and College Ponds SSSI, including avoiding increased recreation pressure and effects on its hydrology
  - Providing an effective transport solution and access, avoiding adding congestion at the Headington roundabout.
  - Addressing the current barrier to walking and cycling formed by the A40 north bypass
  - Ensuring areas in flood zones 2 and 3 around Bayswater Brook are used for accessible greenspace not built development
  - Locating built development on the lower ground and safeguarding the highly sensitive rising landscape
  - Maintaining important views to historic centre of Oxford
  - Mitigation measures to maintain separation between Oxford and Elsfield
  - Protecting surrounding landscape and creation/enhancement of what will be the new permanent Green Belt boundary
  - Protecting heritage assets listed farmhouse and archaeology
  - Delivering community infrastructure, green infrastructure, compensatory improvements for the loss of Green Belt and a net gain for biodiversity
- C. Does the Plan provide the policy framework to address site specific points at B?
  - Yes, through STRAT4, the criteria in STRAT13 and other relevant policies of the Plan (e.g. ENV2 on biodiversity)

- 31. These strategic allocations are consistent within the spatial strategy. Sites were compared and ranked in the Site Selection Background Paper (TOP06.1). On balance the sites are the strongest options in the district.
- 32. The Plan provides the right level of detail and the right hooks to secure the sustainable development of the strategic allocations. There is proactive work going on between the Council, County Council, infrastructure providers, statutory bodies and the site promoters. The close involvement of officers from Development Management, the Specialist teams (ecology, landscape, heritage, urban design) and Garden Towns/ Regeneration team puts the Plan's proposals in a good position to progress towards delivery.
- 33. There were other sites (omission sites) promoted which were not taken up as proposals in the Plan. They were assessed systematically in the SHELAA (<u>HOU01</u>) for constraints and opportunities and were found to perform less well in the SA (<u>CSD04.2</u>) and Site Selection Background Paper (<u>TOP06.1</u>) than those taken forward. Reasonable alternatives have been considered and discarded, with explanation of why alternatives are preferred.

#### Question 5c: Is the balance between the towns sound?

- 34. Yes. The distribution strikes an appropriate balance between the towns, recognising the individual needs, potentials and constraints of the particular settlements.
- 35. The strategy for the towns is different for Didcot and the three market towns. This is appropriate. For Didcot, designated as a Garden Town, the focus is on sustainable growth (STRAT3), with Policy H2 proposing 6,503 homes during the Plan period (some of this already built or committed). Didcot is the least constrained town in the district in terms of heritage, townscape character, geography and surrounding environmental designations. It has experienced

fast planned growth over the last decade which has transformed its centre and character with a modern town centre, a good mix of new housing and a high-quality employment park / enterprise zone (at nearby Milton Park in the Vale). However, until there is a step change in road transport infrastructure, the Highways Authority (OCC) would oppose any further significant growth. Much of the planned new housing from the Core Strategy (ALPO2) and SOLP 2011 (ALPO1) has been delivered and there has been a lag in transport investment. Until the HIF package of measures is delivered, planning more growth at Didcot would have negative consequences for Didcot and surrounding settlements. For this reason the Plan does not make significant new allocations at Didcot beyond those made, but not yet delivered.

- 36. For the three market towns, STRAT 1 supports their roles by maintaining and improving the attractiveness of their town centres and providing for new homes, jobs, services and infrastructure. The Council empowers local communities to use neighbourhood plans as a platform to deliver their objectives. Policies HEN1, THA1 and WAL1 delegate plan-making to neighbourhood plans, a proven and effective model in South Oxfordshire.
- 37. The market towns are all proposed to grow by 15% in their housing stock during the Plan period. The Plan period started in 2011 and all three towns have already delivered a significant amount of development towards the 15% figure. For this reason, Wallingford (which had a large speculative site, Site E, granted outline planning permission in August 2019) has already over-delivered on its number and is not required by Policy H3to make further allocations. Thame and Henley have a reasonable residual number to allocate in their current Neighbourhood Plan reviews.
- 38. The method of applying a percentage of growth based on the town's size at the start of the Plan period means that the market towns will grow in proportion without one town having to plan for significantly more growth than another.
- 39. The amount of growth to the towns is appropriate. If instead the approach was no development or a reduced amount of development, population in the market

towns could fall because of household size declining and, as a result, they could lose services and facilities. To keep vibrancy and retain their role, the towns (and villages) need some growth and investment. Doing nothing does not keep a place the same, it risks a decline in vitality and vibrancy.

- 40. All three market towns have constraints which caution against making new strategic allocations. In size order:
  - Henley-on-Thames is constrained by its physical geography to the east (bounded by the River Thames which forms the district boundary here) and the presence of the Chilterns AONB on all other sides (it is inset within the AONB). It has a narrow historic street pattern which suffers from through traffic, so its centre is designated as an Air Quality Management Area. The Core Strategy Inspector agreed to capping Henley's numbers on the basis of landscape capacity. However, high profitability in Henley and demand for retirement living has resulted in a market drive to redevelop small and medium brownfield sites, generating continued opportunities to accommodate some modest development over the Plan period.
  - Thame is less constrained and has a railway station nearby at Haddenham with strong links to London and Oxford. However, Thame has experienced significant development recently, planned through the frontrunner neighbourhood plan. Further major expansion could impinge on character and require expansion beyond the Thame bypass, bordering Aylesbury Vale and impinging on the floodplain.
  - Wallingford is constrained by the River Thames, minerals safeguarding areas, and the North Wessex Downs AONB. It has a significant amount of development in progress or committed. As a small historic market town, further outward expansion beyond the bypass could bring detrimental changes to character and compactness. Wallingford's historic street pattern channels traffic towards a traffic-lit crossroads of narrow streets, where a 'street canyon effect' traps air pollution and has resulted in its centre being designated as an Air Quality Management Area.

- 41. The Plan explains at para 5.16 that neighbourhood plan groups can make a case through their plan's examination to reduce the housing requirements for their town (set out at Table 5d of the Plan) if they are unable to accommodate the full number (e.g. because of land availability: constrained by AONB, Thames floodplain etc). From past experience, most settlements can find enough suitable land and the approach is a good driver towards re-using brownfield sites within the urban area. If through the evidence prepared for a neighbourhood plan, there are demonstrably not enough suitable sites, there is a clear mechanism to make that case at examination (as was done successfully in 2019 for Goring-on-Thames Neighbourhood Development Plan OCD24, which lies entirely within the Chilterns AONB).
- 42. The Plan provides a sound balance between the towns, with a distinction between Didcot Garden Town (an expanding town of opportunity and investment) and the three historic market towns (with lower levels of proportional growth). Neighbourhood planning is the favoured and proven approach to delivery in South Oxfordshire. All towns will grow and change, but the policies will keep their role and character; none will be forced to sacrifice what makes them special.

Question 5d: Is the approach towards the settlement hierarchy appropriate?

- 43. Yes. The key features of our approach is a tiered classification of places, with provision in the Plan for development at a scale that is tailored to their position in the hierarchy:
  - towns
  - larger villages
  - smaller villages
  - other villages

- 44. The Settlement Assessment Background Paper (TOP07.2) assesses the 140 settlements within the district and provides a clear rationale for categorising them into four tiers of settlement based on their size, services and facilities. The assessment includes population, availability of public transport, employment and a range of health, education, leisure and community facilities. It also assesses proximity to other higher order centres and employment areas.
- 45. Through the Plan's strategic allocations, we also recognise the edge of Oxford as being a sustainable and appropriate location for development, well located for jobs and higher order services. The allocated sites STRAT 11, 12 and 13 are not currently settlements in our district and will grow Oxford rather than creating new settlements for the hierarchy.
- 46. The categorisation has not fundamentally changed since the Core Strategy settlement hierarchy, which was found sound. The fact that the vast majority of settlements have stayed in the same categories shows that development has broadly been directed appropriately, for instance no hamlets have become 'larger villages'. Two villages (both with neighbourhood plans) have moved up from 'other villages' to 'smaller villages'. The stability also shows that services have generally been retained successfully, although a few 'smaller villages' have slipped down, and some former 'other villages' have slipped off the hierarchy. The Plan aims to ensure that, by 2035, we will have delivered this continuity again, with settlements falling in the same category. Although Chalgrove and Berinsfield will have significantly expanded, they are still likely to be 'larger villages'.
- 47. By directing development using the hierarchy, together with recognising the proximity advantages of building at the edge of Oxford, we are planning to develop in places with the most opportunities for sustainable living.
- 48. The Plan provides a tailored approach to each tier in the settlement hierarchy, set out clearly and effectively in STRAT1:

Tier	Relevant bullet point in STRAT1
Edge of Oxford	Meeting unmet housing needs of Oxford City on strategic allocations adjacent to the boundary of Oxford near to where that need arises
The 4 towns	<ul> <li>Focusing major new development in Science Vale including sustainable growth at Didcot Garden Town and Culham so that this area can play an enhanced role in providing homes, jobs and services with improved transport connectivity;</li> <li>Supporting the roles of Henley-on-Thames, Thame and Wallingford by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and mixed-use developments and by providing new homes, jobs, services and infrastructure;</li> </ul>
The 12 larger villages	Supporting and enhancing the roles of the larger villages as local service centres;
The smaller villages  The other villages	Supporting smaller and other villages by allowing for limited amounts of housing and employment to help secure the provision and retention of services;
The countryside	<ul> <li>Protecting and enhancing the countryside and particularly those areas within the two AONB and Oxford Green Belt, by ensuring that outside of the towns and villages any change relates to very specific needs, such as those of the agricultural industry or enhancement of the environment.</li> </ul>

49. This is appropriate because it provides continuity and balance, respecting the relationship between settlements. It protects the vast majority of the district as

open countryside, while meeting needs for growth in the most sustainable locations. It provides for people to have the prerequisites for daily life on hand, living in neighbourhoods and communities, rather than allowing dispersed and less sustainable patterns of growth.

- 50. Our approach in the Plan meets the advice in the NPPF to guide development towards sustainable solutions, taking local circumstances into account to reflect the character, needs and opportunities of each area (para 9). It recognises the variations between urban and rural areas in opportunities to maximise sustainable transport, and focusses development in locations which are or can be made sustainable (para 103). The Plan provides opportunities for villages to thrive and to support local services (para 78), while restricting development in isolated locations (para 79).
- 51. Overall, the Plan reflects the preferred options selected following the consideration of reasonable alternatives during each stage of its preparation, taking into account the evidence base for the plan, engagement and assessment including SA (CSD04.2).
- 52. The Plan provides the framework for contributing to sustainable development across the district, building upon a rigorous process of evidence gathering, assessment and consultation.

#### Conclusion

53. The Council considers that the Plan is sound in relation to this matter and no further changes to STRAT1 are required. A minor modification, to refer in the supporting text to COVID-19, is proposed below.

#### **Modifications**

Proposed Modification (new text is shown in **bold underline** and text that has been removed in shown in **strikethrough**):

New paragraph of supporting text in the Vision and Objectives chapter 3 after para 3.8:

The impacts of COVID-19 on the economy and lifestyle were emerging during the examination of this plan. The plan provides new homes, jobs and infrastructure to meet needs. South Oxfordshire is an area of traditionally high demand and it is reasonable to assume that this will remain the case throughout the plan period. Science Vale and the Ox-Cam arc is an area which is likely to be important for the country's recovery. The plan contains sufficient flexibility (for example in its employment policies) to provide an appropriate framework for changing lifestyles and needs. If development needs prove slower in coming forward, or change, this will be monitored (see chapter 12 of the plan). The plan can be reviewed if necessary.

# **Appendix 1: Key References**

Key National	Para 9 of NPPF
Policies and	• Para 11
Guidance	• Para 20-23
	• Para 72
	• Para 78
	• Para 79
	• Para 103
	• Para 137
	• Para 150
Other Relevant	Ctrotogic allocation policies STDAT 2 and 7 14
Policies in the	Strategic allocation policies STRAT 3 and 7-14     Town strategies HEN1, THA1, WAL1
South Oxfordshire	Town strategies HEN1, THA1, WAL1     Settlement biography. Appendix 7.
Local Plan	Settlement hierarchy Appendix 7
Key Evidence Base	<u>CSD04.2</u> Sustainability Appraisal
Studies	ALP01 South Oxfordshire Local Plan 2011
	ALP02 South Oxfordshire Core Strategy
	IC1A Council's Response to Inspector's Questions IC1
	TOP04 Spatial Strategy Topic Paper
	DUC01 Memorandum of Cooperation between the
	local authorities in the Oxfordshire Housing Market
	TOP06 Site Selection Background Paper Part 1
	TOP06.1 Site Selection Background Paper Part 2
	HOU1 South Oxfordshire Housing and Economic Land
	Availability Assessment (SHELAA)
	TOP07.2 Settlement Assessment Background Paper



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