

SOUTH OXFORDSHIRE CORE STRATEGY

INSPECTOR'S DRAFT CONCLUSIONS FOR TESTING THROUGH SA

These draft conclusions are set out under 6 main topic headings, followed by brief reasoning in each case. The implications of the CS in this form (together with the other draft changes offered by the Council in the November hearings) now need to be tested by the Council through SA.

Topic area 1 The South East Plan/Central Oxfordshire

1.1 Para 7.4 Delete the first sentence (referring to the abolition of the South East Plan) in the submission and post-submission versions of the CS

1.2 Footnote 54 to the post-submission changes Delete

1.3 Table 7.3 [See the footnote proposed to be added to the post-submission version of table 7.3 below.]

Skeleton reasoning – topic area 1

To secure and demonstrate general conformity with the South East Plan

Topic area 2 The distribution of housing development, including SOSDA

2.1 Below para 7.6 Insert the following text:- ‘The South East Plan proposes a ‘South of Oxford Strategic Development Area’ of 4,000 dwellings within this District, adjoining the City boundary. This proposal was subject to a legal challenge acceded to by the Treasury Solicitor on the grounds that insufficient sustainability appraisal had been undertaken of possible alternative locations for meeting the wider housing needs of the City. In the absence of a completed consent order, the precise outcome of the challenge has remained unresolved, in particular whether or not the 4,000 dwellings would be deducted from the Central Oxfordshire sub-regional total.

Any provision of a Strategic Development Area on the scale identified in the South East Plan would require joint work and sustainability appraisal of reasonable alternative options involving a number of Districts bordering the City. The current adopted Oxford Core Strategy makes no reference to any wider growth needs beyond the City boundaries. However, if it became necessary to address this matter on an inter-authority basis the established County/District mechanisms provide a means of pursuing the ‘duty to cooperate’.

2.2 Paras 7.8 & 7.9 Redraft to read:- ‘Outside the main focus of planned growth at Didcot, about 60% [1730] of the balance of the total of new housing

allocations to be provided through this strategy is directed to the market towns of Henley, Thame and Wallingford. A high proportion of South Oxfordshire residents (about 60%) currently live in rural areas, so the urban focus of the strategy, directing new allocations primarily towards Didcot and the other 3 towns will significantly rebalance the present urban/rural mix in South Oxfordshire, especially taken in context with the substantial number of existing commitments at Didcot [3780]. However, about 40% of the balance of new allocations to be made outside Didcot [1154 homes], or about 28% of new allocations including those at Didcot [1154/4060] is directed towards the 12 larger villages because it is an important aim of this strategy to provide growth to support the maintenance of services and facilities at this identified network of key rural centres.

The starting point for the strategy was to distribute the homes allocated to Henley, Thame and Wallingford generally in proportion to their relative sizes (40%/35%/25%). However, a cap of 400 has been imposed at Henley because of the lack of certain identifiable capacity for physical growth due to constraints posed by the Thames flood plain and the Chilterns Area of Outstanding Natural Beauty. This results in the diversion of a total of just under 350 or so homes proportionately to Thame and Wallingford. The distribution of the growth allocated to the larger villages will be decided through the Site Allocations DPD on the basis of the principles set out in para 7.18.'

2.3 Table 7.3 An asterisk to be placed next to the figure '1154', referring to a footnote to read:- 'These allocations should be divided so that at least 500 are provided at Larger Villages in the Central Oxfordshire area. This will secure general conformity with the South East Plan. The larger villages in Central Oxfordshire are Benson, Berinsfield, Cholsey, Crowmarsh Gifford and Wheatley. Part of this Central Oxfordshire provision may also be met by an appropriate allocation at Bayswater Farm.'

2.4 Para 7.16 Delete final sentence.

Skeleton reasoning – topic area 2

2.1 SOSDA Progression of this concept would go beyond the individual scope of South Oxfordshire and require extensive inter-authority work, including SA of reasonable alternatives. The draft paragraphs would summarise the history of SOSDA and explain the mechanism stated as being the Council's preferred means of dealing with any future consideration of the wider growth of the City.

2.2 Paras 7.8 & 7.9 These revised paragraphs would bring together the explanation of the distribution strategy in one place and provide necessary increased clarity.

2.3 Table 7.3 (2.3) This footnote would ensure 'general conformity' with the South East Plan by securing a minimum of 500 allocations in the Central Oxfordshire (CO) larger villages. This would provide at least 2149 dwellings in CO against the SEP target of 2352, so that any shortfall would not exceed 200 or so (about 8.6%). The SHLAA provides the necessary evidence that the CO villages

provide adequate opportunities for the Site Allocations DPD to achieve at least that level. However, application of the principles in CS para 7.18 may result in the SADPD allocations in the CO villages exceeding 500. This is because Berinsfield is to have a Green Belt review, Crowmarsh Gifford is functionally highly linked with Wallingford, and all the Central Oxfordshire larger villages are reasonably well-connected compared with some of the non-CO larger villages which tend to be at greater distance from the nearest towns and are, in several cases, more deeply embedded in the AONB.

2.4 Para 7.16 This sentence is incompatible with the certainty intended to be conferred by a plan-led system of development management. Once a DPD had been adopted it would be inappropriate for planning permission for an allocated site to be withheld in these circumstances. While the Council accepted the logic of this it was reluctant to lose the perceived protection afforded by the sentence pre-adoption.

Topic area 3 Green Belt review

3.1 Paras 7.19 to 7.20 Redraft as follows to exclude reference to review of the Green Belt at Wheatley, leaving it as follows:- ‘Policy CSEN2 provides for a local review of the Green Belt at Berinsfield, a planned post-war village built on the site of a Second World War airbase. The village is currently entirely within the Green Belt. The exceptional circumstances which justify this review are as follows: [*include the four bullet points below para 7.19*]

The review will be undertaken in consultation with the local community in the context of a new vision for the village prepared through the medium of the Site Allocations DPD.’

3.2 Policy CSEN2 Redraft the second sentence as follows: ‘A local review of the Green Belt will take place at Berinsfield.’

3.3 Para 14.6 Redraft to read: ‘Section 7 of this strategy explains the exceptional circumstances warranting a local review of the Green Belt at Berinsfield to be undertaken in the Site Allocations DPD. Apart from this, we will maintain the Green Belt and apply national policy guidance as set out in PPG2.’

Skeleton reasoning - topic area 3

Exceptional circumstances for a Green Belt review have not been demonstrated in the case of Wheatley. [Fuller reasoning has already been given in my preliminary conclusion on this matter]

Topic area 4 Henley

4.1 Policy CSHEN1 Reword first bullet point to read ‘identify land for a minimum of 400 new homes’

4.2 Para 10.9 Reword the final two sentences as follows:- ‘It is difficult to identify suitable sites for housing around Henley because of the strong constraints of the Thames floodplain and the town’s position, flanked by the Chilterns Area of Outstanding Natural Beauty. Our strategy therefore caps the level of growth that the town would otherwise take on a proportional basis, requiring the Site Allocations DPD to identify land for a minimum of 400 homes. A study in September 2011 indicated a reasonable prospect that this is achievable, although the margin of contingency may be limited. However, in view of the level of need in Henley, the Site Allocations DPD will explore the possibility of easing the capped growth of the town by an appropriate amount if it should prove to be possible to identify suitable land free of constraints in the circumstances then pertaining.’

Skeleton reasoning – topic area 4

The recent study confirmed that there are still some uncertainties about the acceptable capacity of certain sites eg Highlands Farm. At this stage it is safe only to conclude that the margin of contingency around the 400 cap may be limited. However, since Henley has a high level of housing need and (narrowly) the best sustainability credentials of the settlements in South Oxfordshire, this modest change to para 10.9 would make the CS sound in effectiveness terms by affording appropriate flexibility for the Site Allocations DPD to explore some easing of the capped growth of the town if any change in circumstances were to make it possible to do so.

Topic area 5 Thame

5.1 Policy CSTHA2 Reword as follows:- ‘New allocations at Thame

The Neighbourhood Plan for Thame will allocate land for 775 new homes on land selected through that process as the most appropriate and sustainable.’

5.2 Paras 11.14 to 11.16 Reword as follows:-

‘11.14 Provision of additional housing will help to support the town centre’s attraction in relation to nearby centres and maintain Thame’s services and facilities. The overall strategy is to provide 775 additional houses to 2027 on sites selected by a neighbourhood plan.

11.15 The selected sites will need to have a form and character which meet identified needs and be planned comprehensively in accordance with agreed design briefs reflecting policies CSQ1-4 and other relevant policies in the Local Development Framework. The developments should avoid building on areas of land within flood zones 2 and 3, provide safe pedestrian and cycle links to the town centre, and make provision (or provide contributions towards) such necessary supporting infrastructure as is set out in the infrastructure delivery plan.’

Maps 11.1 and at p165 of the CS The above change would necessitate change to the former and deletion of the latter.

Skeleton reasoning - topic area 5

The proposed allocated site (F) has many favourable sustainability credentials. However, it is unclear that it has the scope to accommodate 600 new homes together with sensitively planned structural planting on a sufficiently generous scale to avoid excessive damage to the attractive sloping landscape on this side of the town as appreciated, for example, from the Thame Valley Walk. An allocation on this scale has therefore not been shown to be justified.

A number of other potential sites around the town have been found to have their particular advantages and disadvantages and their own supporters and opponents at various times in the evolution of the CS. Moreover, the post-submission changes to the CS acknowledge that Thame's housing growth cannot all be accommodated on one site, and it is evident that there is considerable local support for directing it to a number of different locations.

An important new factor is that the Town Council has recently been awarded front-runner status in neighbourhood planning and has commenced that process with the assistance of a planning consultancy specialising in master-planning and urban design. This process offers an opportunity to build a community-based approach to the identification of the CS housing provision, together with consideration of the implications of any school relocation that may be shown to be necessary. The current estimated timescale for this work may be over-optimistic and, to judge by the evolution of the CS proposals for Thame, the process will not necessarily be straightforward or without considerable contention. However, the process has already commenced and has the potential to result in a full set of allocations in a shorter timescale than would be required if the Site Allocations DPD were dealing with the balance of the outstanding 175 sites. It would be premature and unsound to make a substantial allocation at site F merely because the Council is 'on the cusp' of the 5-year land supply. This change would therefore make the CS justified and effective in its approach to allocations in Thame.

Topic Area 6 **Wallingford**

Policy CSWAL2 Rerword as follows:

'Permission will be granted for a new greenfield neighbourhood of 555 homes to the south of Wallingford.....'

Some of the criteria to the policy be changed as follows:

'(iii) access is provided from a new arm of the White Cross roundabout, together with limited access for buses and emergency vehicles, cyclists and pedestrians from Reading Road,

(vii) sensitive treatment is given to enhancing the landscape and ecological interest of the boundaries of the site and the Bradford's Brook corridor.

(viii) a pedestrian and cycle link is provided to the residential area to the north and improved pedestrian/cycle links to Cholsey'

and a further criterion to be added as follows: '7 hectares of public open space are to be provided'

Para 12.12 Change the third sentence to read:- '...to the south of Wallingford...' and the fourth to read :- 'This site has been selected as the best able to integrate with the fabric of the town and afford good pedestrian and cycling links to major local destinations, especially the town centre, and Cholsey Station. It will also provide for improvements to the education and public transport infrastructure of Wallingford and a major area of open space.'

Map 12.1 and at p164 of the CS The above change would necessitate change to the former and deletion of the latter.

Skeleton reasoning – topic area 6

The sustainability appraisal of the submitted CS indicated that the credentials of sites A, B (the allocated site) and E were all broadly similar and that the findings did not present a clear 'winner'. Option E was at that time regarded as less favourable due to poor links to the area north of Bradford Brook and the 'potential' to have an adverse effect on the landscape character of the Winterbrook area.

Site B would have no interconnection with the road network of Wallingford: vehicle access would be entirely by a remotely-located new junction onto the bypass which would tend to encourage car usage. There are 3 points of pedestrian access to the town, only one of which (to Wantage Road via Queens Avenue) appears to have the potential to be rendered fully attractive. That in the south east corner leads into Fir Tree Avenue and thence to Hithercroft Industrial area and the Sports Park but this is a very narrow unlit path between a high domestic fence and the hedged boundary to the allotments. The potential for significant improvement is uncertain. The path at the north-east corner of the site offers the most direct route to the town centre but currently has the character of an unattractive alleyway, serving as an access to private garages. While its pot-holed unsurfaced nature is capable of being improved and there is some suggestion that it may be able to be lit, the route would remain mostly without natural surveillance. Overall, these difficulties cast doubt on the extent to which many residents of this site would find these routes safe and inviting options for walking or cycling to facilities within the town, particularly after dark. Site B is therefore not a sound location for a strategic allocation.

By contrast, residents at site E would have pedestrian and cycling access to the town via improved links from Winterbrook Lane and 2 Winterbrook. One of the two promoters of this land has also recently acquired an option to purchase a residential property to the north of the site. This additional option means that the site could provide attractive routes for walkers and cyclists to reach a wide number of the town's destinations, including the premium bus service, thus removing one of the disadvantages of this site noted in the SA. As for the other disadvantage of this site stated in the SA (the 'potential' for landscape detriment) in my view too much weight has been ascribed to this. I concur with the views of other Inspectors on the landscape

quality of site E, expressed in the context of the ‘prematurity’ appeals. Overall, the landscape quality of this site is not such as to present an overriding objection to its development. Compared with site B (where development would be separated from the bypass only by a landscape buffer and have a greater effect in terms of reducing the gap between settlements) this land could present a substantial open aspect to the bypass with a new area of 7ha of open space in the foreground and development set back behind the new tree planting to the north of Winterbook Lane. The eastern tree-lined fringes of the site south of Winterbrook Lane would remain widely visible across the open space whereas the landscape at the Winterbrook boundary in the north-east corner of the site is hidden from public view and not of such quality as to require to be kept free of development. Some recent boundary planting has already occurred here and this is capable of enhancement as part of any development.

Judged overall, site E could be integrated far more effectively into the urban fabric of Wallingford than site B, affording residents superior access on foot and by cycle to a wide range of the town’s main destinations. It could provide similar benefits to site B in terms of education and improved public transport, in both cases by through-site routing and improved frequency of (albeit different) ‘hourly/hourly-plus’ services. However, site E could also offer a major new open space and circular walks through the site, including along the brook. Moreover, it would have better connections with Cholsey Station. In view of all these factors site E would be a sound allocation, being both ‘justified’ and (since it is promoted by two national house-builders working together) ‘effective’.

Roy Foster
Inspector

30 November 2011