Subject: South Oxfordshire District Council Core Strategy. Representation on matters raised in the NPPF and planning policy for traveller sites.

Dear Helen,

On behalf of my clients, the University of Reading and Croudace Homes, who control the land at North East Didcot, I would make the following representations on the matters raised in these documents insofar as they relate to the soundness of the South Oxfordshire Core Strategy and the two phases of changes (main modifications) previously advertised. In summary, I consider that the identification of the North East Didcot site for housing as an urban extension to Didcot is entirely consistent with the policies in the NPPF.

Comment on relevant provisions of the NPPF

The Ministerial foreword on page (i) of the NPPF opens with the statement that:

‘The purpose of planning is to help achieve sustainable development. Sustainable means ensuring that better lives for ourselves don’t mean worse lives for future generations. Development means growth.... We must house a rising population, which is living longer and wants us to make new choices.’ (Author’s underlining, and throughout these representations).

Para 17 of the NPPF sets out the core land use planning principles that should underpin plan-making, bullet point three of which states that planning should:

‘proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is
suitable for development in their area, taking account of the needs of the residential and business communities;’

The eleventh bullet point of the core land use planning principles at paragraph 17 of the NPPF states that planning should:

‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;’

Paragraph 47 of the NPPF sets out a list of measures required of local planning authorities in order to boost significantly the supply of housing. The first bullet point includes a requirement to:

‘use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as consistent with the policies set out in the NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.’

Para. 52 of the NPPF advises

‘The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development.’

Given the emphasis which the NPPF is now placing on a range of housing locations, including extensions to the urban area in paragraph 52, I consider that the NPPF only serves to reiterate those points made in our representations to the EIP, and which had a particular focus on housing delivery and the sustainability of the North East Didcot site. Didcot is the largest and most sustainable centre within the District, and is an identified Growth Point.

NPPF paragraph 6 reiterates that:

‘The purpose of the planning system is to contribute to the achievement of sustainable development’.

According to paragraph 7:

‘There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:’
an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and

an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.’

Paragraph 8 explains that these roles should not be undertaken in isolation, and

‘that to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play and active role in guiding development to sustainable solutions.’

I consider that the North East Didcot will contribute to the achievement of the sustainable development advocated in the NPPF.

Paragraph 182 states that:

‘The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound.’

The soundness criteria remain essentially the same.

NPPF goes on to advise at paragraph 159 that:

‘Local planning authorities should have a clear understanding of housing needs in their area. They should:

- prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessments should identify the scale and mix of housing and
the range of tenures that the local population is likely to need over the plan period which:

– addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);\(^{34}\)

\(^{34}\) The planning policy for traveller sites sets out how travellers’ accommodation needs should also be assessed.

**Comment on relevant provisions of the planning policy for traveller sites**

The relevant provisions of the planning policy for traveller sites are noted.

I hope this letter is helpful and no doubt if there are any issues you will contact me further.

Yours sincerely

Jeremy C Woolf, MA DipTP MRTPI