Dear Mrs Wilson,

EXAMINATION OF SOUTH OXFORDSHIRE’S PROPOSED SUBMISSION CORE STRATEGY - ADDITIONAL CONSULTATION FOLLOWING PUBLICATION OF THE NATIONAL PLANNING POLICY FRAMEWORK

I am writing in response to your emails of 3rd and 23rd April 2012 seeking views of Wokingham Borough Council regarding the extent that the publication of the National Planning Policy Framework (NPPF) (including associated advice on gypsies and travellers) together with the Planning Inspectorate’s model policy has implications for the Proposed Submission South Oxfordshire Core Strategy.

Other than the two comments below, the Council has no other comments regarding implications associated with the publication of the National Planning Policy Framework (NPPF) and for the Proposed Submission South Oxfordshire Core Strategy:

a) Wokingham Borough Council is concerned that the Proposed Submission South Oxfordshire Core Strategy has not effectively addressed “Planning strategically across local boundaries”, due to the recognised issues associated with cross-Thames travel. This is explained further below; and

b) Paragraph 159 of the NPPF recognises that housing market areas can cross administrative boundaries. The Oxfordshire Strategic Housing Market Assessment (CD09/04) (figure 2.16) recognises that there is a blurring of boundaries within the parts of Oxfordshire closest to Reading and the M4 corridor.

Cross-Thames travel
Whilst South Oxfordshire’s Background Paper on Cross Boundary matters (CD08/02) recognises that cross-Thames travel is an important strategic issue, the approach of the Core Strategy does not accord with paragraph 179 of the NPPF which states “Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance because of a lack of physical capacity”. Wokingham Borough’s Core Strategy (CD05/12) confirms that its administrative area only includes land on the southern bank of the Thames. Consequently, there is a lack of physical capacity to deliver an additional crossing of the Thames (near to Reading) from any point within Wokingham Borough without involving land in South Oxfordshire. This includes a crossing using the alignment included within the Council’s original representations.
The Council therefore advocates that the South Oxfordshire Core Strategy is amended in line with that proposed in its original representations concerning cross-Thames travel to ensure that it effectively addresses this important issue within the NPPF.

Planning Inspectorate Model policy
With regard to the Planning Inspectorate’s model policy, the Council has two comments together with a concern with the approach. The comments are:

a) legislation emphasises the primacy of the development plan in determining applications which is not reflected in the final paragraph of the proposed policy contrary to paragraph 2 of the NPPF; and

b) the proposed policy is not considered to “provide a clear indication of how a decision maker should react to a development” as required by paragraph 154 of the NPPF.

In addition, the Council recognises that the proposed policy (and any reasonable alternatives) must be considered through the Strategic Environmental Assessment especially as such an appraisal of the Core Strategy has been produced. Without a formal appraisal (including subsequent consultation on the assessment), it would not be appropriate to include the policy within the document.

If you have any queries regarding the Council’s response, please do not hesitate to contact me.

Yours sincerely,

Graham Ritchie
Senior Planning Officer