

Ian Kemp
Programme Officer

South Oxfordshire Local Plan Examination

PO Box 241, Droitwich, Worcestershire, WR9 1DW

Mobile: 07723 009 166

E-Mail: idkemp@icloud.com

From Jonathan Bore MRTPI

Inspector, South Oxfordshire Local Plan Examination

Mr Adrian Duffield

Head of Planning for South Oxfordshire District Council

By email

28th August 2020

Dear Mr Duffield

Examination into the South Oxfordshire Local Plan 2011-2034

Inspector's preliminary conclusions and post-hearings advice

1. This letter sets out my preliminary conclusions on the key matters that arose during this examination, in order to provide clarity for the Council and all other parties at an early stage. It does not attempt to deal with all the issues that arose during the examination and its hearings.
2. It also addresses the more significant main modifications that arose *in the hearings*. Items where a modification is required and wording has been agreed subject to consultation are marked *. The Council will need to finalise its draft schedule of main modifications for consultation and sustainability appraisal.
3. Several main modifications were identified *in advance of the hearings* through written discussion between myself and the Council, and their draft wording is set out in Document CSD13. They have been on the examination website for some weeks and this letter does not deal with them in detail, except where necessary to explain the background (such as in the case of the housing requirement) or where the hearing discussions have led to subsequent changes in the proposed wording.
4. I am not inviting comments on this letter. The main modifications will be published for consultation and will be subject to sustainability appraisal in due course.

The plan period

5. The plan period of the submitted plan is 1 April 2011 to 31 March 2034. Rolling forward the plan period to 31 March 2035 is an obvious solution to the need to ensure that the plan looks forward about 15 years from 2020. This main modification is sound and the Council do not need to roll the plan's end date forward any further beyond 2035.

The overall housing requirement

6. Policy STRAT2 of the submitted plan contains a total housing requirement of 22,775 homes, consisting of 17,825 homes for South Oxfordshire at a rate of 775 dwellings per annum (dpa) over the plan period to 2034, and an additional 4,950 homes to meet Oxford City's unmet housing needs.

7. Changing the end date of the plan to 31 March 2035, but retaining the same annual delivery rate for South Oxfordshire and the component for Oxford City, gives a total housing requirement of 23,550 homes over the revised plan period. The relevant modification to Policy STRAT2 is set out in Document CSD13.

8. I have given careful consideration to the evidence at the hearings but I am not recommending any further change to these modified figures. They are higher than would arise from the standard method, but there are a number of strong reasons why this should be so.

9. Oxford and Oxfordshire are of key economic importance and the success of the area's economy generates substantial housing need. Infrastructure constraints and housing affordability issues within the County, including South Oxfordshire, are well documented and it is important to ensure that, as well as ensuring that everyone has a decent home, economic growth should not be hampered because of a shortage of housing, a very expensive housing market, and inadequate infrastructure. These are some of the factors that lie behind the Oxfordshire Growth Deal. The strength of the Oxfordshire economic base and problems of housing affordability are persistent characteristics, having been well established before the 2014 SHMA was published, and the circumstances that gave rise to the Growth Deal are as relevant as ever.

10. The ability of householders to afford housing is a significant challenge in South Oxfordshire. In terms of market housing, the current median property price to median earnings ratio is 11.6; in 1997 it was 5.3. The plan's housing requirement will help to address the serious issue of market housing costs and this, combined with Policy H9 which seeks 40% affordable housing (and 50% adjacent to Oxford – see below), which has been viability tested, will go a substantial way towards meeting the affordable housing needs of the District.

11. The plan also makes provision for additional homes which will contribute towards meeting the City of Oxford's large unmet housing need. The plan allows for an additional 4,950 homes for this purpose with 50% affordable housing sought on the site allocations adjacent to Oxford, a similar proportion to that sought by the Oxford Local Plan itself. I consider that the plan takes a sound approach towards meeting Oxford's unmet needs. It is also appropriate that the

plan seeks to meet them over the whole plan period rather than to 2031, because Oxford City's plan itself, and its housing calculation, extend to 2036.

12. Planning Practice Guidance indicates that housing need may be higher than the standard method indicates. These can include situations where there is a growth strategy for the area, such as a Housing Deal; where strategic infrastructure improvements are likely to drive an increase in the homes needed locally; where an authority has agreed to take on unmet need from neighbouring authorities; and where previous levels of housing delivery in an area, or previous assessments of need are significantly greater than the outcome from the standard method. All these apply in the case of South Oxfordshire.

13. My conclusion at this point therefore is that the housing requirement as proposed to be modified, 23,550 homes from 2011 to 2035, is justified. A lower housing requirement would not support the national objective to boost the supply of housing. It would fail to address housing affordability issues, affordable housing need and the housing impediments to the successful economic growth of the area, would be inconsistent with the range of other adopted plans in Oxfordshire, would not satisfactorily address Oxford City's unmet housing needs, and would ignore the evidence of recent years that the District is capable of delivering housing at a higher level. Equally, a higher figure is not, on the evidence, justified for soundness reasons, and I am mindful that there is substantial headroom in terms of existing housing commitments.

Housing supply

14. The original housing delivery trajectory in Policy STRAT2 does not reflect the reality of housing delivery since the plan period, and in the interests of soundness the suggested stepped trajectory in Document CSD13 (subject to an arithmetical correction for the period 2032/33 to 2034/35) should go forward as a main modification. This would establish the annual housing requirement as follows:

- 2011/12 to 2025/26- 900 homes per annum
- 2026/27 to 2031/32-1,120 homes per annum
- 2032/33 to 2034/35- 1,110 homes per annum

15. This should enable the maintenance of a rolling 5 year housing land supply. The plan does rely to a considerable degree on large strategic site allocations to achieve housing delivery over the plan period, and I am aware of the issues that can influence lead-in times (as highlighted in the Lichfield report "Start to Finish"). However, there is significant headroom because of existing commitments, and the Council have tested the robustness of the plan by assessing the impacts of a year's delay to all strategic sites across the board and the entire failure of one of the strategic allocations to deliver. I am satisfied that the housing supply is robust.

Meeting the needs of different households

16. The submitted plan generally takes a sound approach towards meeting the needs of different households, but does not adequately create the conditions for meeting specialist housing needs and the needs of older people. The suggested changes to the wording of Policies H1, H9 and H13 in document CSD13 partially address these requirements.

* The Council's further suggested changes allow for specialist housing for older people on unallocated sites in certain circumstances. I am content that this wording can go forward for consultation as a main modification.

Housing density

17. The high minimum housing densities in Policy STRAT5 of the submitted plan are too prescriptive and do not adequately take into account local character and housing mix.

* The Council have put forward alternative wording which allows consideration to be given, when establishing the density of a development, to the need for high quality design, local circumstances, site constraints, accessibility to facilities and transport, and living conditions. This should be taken forward for consultation as a main modification.

* The strategic site allocations need to say more about density. The revised wording in this regard has been agreed with the site promoters and should be taken forward for consultation as a main modification.

The spatial strategy and the strategic site allocations

18. The spatial strategy fulfils three objectives:

- meeting Oxford's housing needs close to the city (STRAT11: Land South of Grenoble Road, STRAT12: Land at Northfield and STRAT13: Land North of Bayswater Brook);
- delivering homes and employment land within the area known as Science Vale to support housing need and the strong economy of that area (STRAT9: Land Adjacent to Culham Science Centre and STRAT10: Land at Berinsfield);
- delivering homes and employment land on largely previously developed sites (STRAT7: Land at Chalgrove Airfield, STRAT8: Culham Science Centre and STRAT14: Wheatley Campus).

19. The spatial strategy both supports and responds to planned and funded infrastructure improvements and supports the potential for other improvements. The scale of the allocations will ensure that they are capable of sustaining their own local facilities and bus routes. My preliminary conclusion is that the spatial strategy is logical, justified on the evidence, integrated and sound.

Allocations which will help to meet Oxford's unmet housing needs

20. There is clear justification for seeking to meet Oxford's unmet housing needs close to its built up area. This will allow for short journey distances to workplaces

and social facilities, as well as having the potential to strengthen retail, social and transport facilities within adjacent parts of Oxford. This of course requires the alteration of Green Belt boundaries, but seeking to meet this need beyond the Green Belt would not address the serious affordability problems of the city, would not meet need where it arises and would result in longer journey patterns including journeys by private car. It would impose additional journey to work costs on people who may already find housing costs challenging. To try to meet Oxford's unmet housing needs in, for example, the market towns or Didcot would not meet need where it arises and is a less sustainable approach. The allocation of the three strategic sites next to Oxford, with their ability to deliver 50% affordable housing, near substantial employment centres, is an essential response to meeting the significant level of unmet need in the city.

21. STRAT11, STRAT12 and STRAT13 are open land currently in the Green Belt, but they adjoin development on at least one side, are seen in the context of development, and are not notably significant in landscape terms; and enough land is included in the allocations to enable good quality landscaping, greenspace and strong green boundaries to be provided. Development of these sites would appear as natural extensions to the Oxford built-up area.

22. STRAT11: Land south of Grenoble Road would deliver a substantial number of homes, an extension to the South Oxford Science Park and land for a Park and Ride site.

* The site contains a sewage works. A modification is required to enable development to commence subject to an odour assessment. The wording has been agreed for consultation.

* The site will be expected to deliver improvements to existing community facilities at Blackbird Leys where necessary to address impacts arising from the increased usage by the residents of the new development. A modification is required to clarify this requirement and the relationship of the site with the regeneration of Blackbird Leys. Suggested wording has been put forward which may be taken forward for consultation.

23. At STRAT12: Land at Northfield, I am satisfied that the site can be developed to ensure satisfactory living conditions notwithstanding the proximity of Unipart and other nearby industrial plant, and although the gap between Oxford and Garsington would be reduced, the allocation would not cause coalescence. Indeed, there would be sufficient space to include boundary and structural planting which could soften the edge of the built up area compared with the present view of the very bulky Unipart building.

24. In the case of STRAT13: Land North of Bayswater Brook, there is plenty of land to incorporate a buffer and alternative greenspace between the site and the adjacent SSSI.

* A modification is required to STRAT13 to align the transport requirements for the site, as far as possible, with Oxford City's planning policies concerning reduced car use and sustainable transport priorities, which may assist in reducing the need for extensive highways infrastructure. The suggested wording

has been agreed with the County Council and site promoters and can be taken forward for consultation as a main modification.

Allocations in Science Vale

25. It is logical to inset Culham Science Centre (STRAT8) from the Green Belt as it is an important developed site.

* The boundary of the inset area at STRAT8 should be contiguous with the safeguarding line to make the best use of this land and ensure that the functioning of the site is not impaired.

26. The allocations next to Culham Science Centre (STRAT9) and at Berinsfield (STRAT10) also require alterations to the Green Belt boundaries, but they are also strongly justified by the evidence. Science Vale contains an important cluster of technological activity, and supporting economic growth includes ensuring that there is enough housing, at the right price, for those working in that sector. STRAT9 is next to an important employment centre which is receiving substantial investment, and has a rail station with the potential for an improved service, whilst STRAT10 will bring transformational benefits to the existing village. Both are supported by major infrastructure improvements arising from the successful HIF bid.

* At STRAT10, Berinsfield, a main modification is required to set out the plan's intentions more clearly in respect of tenure mix. Wording has now been suggested which can be taken forward for consultation as a main modification.

Previously developed sites

27. The Wheatley Campus allocation (STRAT14) makes good use of a previously developed site close to a main route into Oxford.

* A main modification has been formulated that brings the policy into line with the terms of the recent planning permission.

28. The Chalgrove Airfield allocation, STRAT7, provides an important opportunity to deliver a substantial part of the District's housing needs on a largely previously-developed site without landscape significance outside the Green Belt. Although several miles from Oxford and other towns, the allocation would be large enough, particularly when taken with the village, to develop into the size of a small town with an adequate range of facilities and there is growth potential beyond the end of the plan period. The transport infrastructure that is required to support it, including bus services and the bypasses to Stadhampton, Chiselhampton and Cuxham, would also provide substantial benefits to other communities. Masterplanning would need to ensure that the allocation was well integrated with the existing village.

29. The site contains a leading global technological aviation-related business on a long lease, and the allocation requires a relocated runway. There are unresolved issues about the adequacy of this alternative provision and the relationship of the existing business to the new housing. A range of consents would be required, especially from the CAA and HSE. But my conclusion at this

stage is that these circumstances do not make the allocation unsound or undevelopable such that it should be removed from the plan, for a number of reasons.

30. These include Homes England's CPO powers; the fact that this is a site allocation, not a planning application, with flexibility to adjust development and operational areas if necessary; the policy flexibility in the total number of homes to be delivered; the satisfactory co-existence of the existing operation with nearby Chalgrove; the absence of evidence that the allocation would inevitably conflict with the 2015 General Aviation Strategy or any emerging strategy arising from Aviation 2050; and the additional flexibility (subject to planning, environmental, health and safety and aviation regulations) which might be brought into the equation from Homes England's recent acquisition of land to the north of the site, which should not be discounted.

31. Development planning inevitably involves grappling with uncertainty, but there is enough evidence in the case of Chalgrove Airfield to indicate that there is a reasonable prospect of the allocation being implemented. The Council's housing trajectory indicates a relatively long lead-in time for this site, considerably longer than that envisaged by the site promoter, and the plan is robust enough to deal with any delay in implementation. Were the site to prove difficult to develop, the situation would be monitored and the issue could be reconsidered in a subsequent plan.

* Revised wording for the policy and text have been put forward to address cycle connectivity, bus frequency, retail provision and biodiversity and these can go forward as main modifications for consultation.

Didcot

32. The plan does not allocate a large amount of additional housing to Didcot because of the very significant volume of existing commitments. This is a reasonable approach which will still allow Didcot to grow substantially and play an important part in the spatial strategy. Didcot is not in the Green Belt, but allocating further development to the town would not, in this plan, be a reasonable alternative to the allocations on the edges of Oxford and those at Culham or Berinsfield, which fulfil important objectives and provide a choice of sites and locations to meet different needs.

The Market Towns

33. The market towns of Wallingford, Henley-on-Thames and Thame have seen very considerable growth and have a large volume of commitments. They do not represent a reasonable alternative to the strategic allocations, partly because they are located some distance away from major centres of housing and employment, and partly because of the need to protect their character and their historic centres and ensure that their community facilities do not come under excessive pressure. Nonetheless, they are some of the best connected and most sustainable settlements in the district and have a role in delivering housing to meet the overall requirement and local needs.

34. Against that background, a starting point of 15% growth to the 2011 existing housing stock plus the requirements from the Core Strategy, to be delivered through the neighbourhood plans, is a reasonable approach which will result in proportionate growth depending on the existing size of the town. However, paragraph 5.16 appears to allow neighbourhood plans to deliver below 15%, whereas there is no convincing evidence that this is necessary to avoid harm to any of the towns, the surrounding landscape, the AONB or other designations. Moreover Table 5d and Policy H3 are written in such a way as to appear that neighbourhood plans only need to cater for relatively small residual requirements (zero in the case of Wallingford) and this could be seen as a cap on development.

* Modifications are required to ensure consistency of wording in the policy criteria for the three towns. Acceptable wording has been put forward which can be included in the schedule of main modifications for consultation.

* To ensure that the plan takes a positive approach towards sustainable development opportunities in the market towns, the housing requirements for the market towns, and the outstanding requirement for neighbourhood development plans, should be expressed as minima. The policy should also indicate that NDPs should seek to meet demonstrable local needs, for example for specialist or affordable housing, even where this would result in housing provision in excess of the minimum outstanding requirement.

Reading

35. Reading is south of the District. Its Council has not asked South Oxfordshire to take any of its unmet housing need, which is catered for elsewhere, or to make provision for housing in the vicinity of the town. Its transport strategy, which includes park and ride and possible future highway provision, will entail discussion with South Oxfordshire in due course, but the submitted plan is not guilty of any omission in respect of Reading's needs and no modification is required.

The villages (all categories)

36. The plan is proportionate in its approach towards the amount of development expected of the villages. The dispersal of substantial amounts of development to the villages would not provide the opportunity for the kind of comprehensive transport, social and community facilities that can be achieved by the strategic site allocations.

Unclassified settlements

37. As regards unclassified settlements, whilst the courts have clarified the application of NPPF paragraph 79, that does not prevent local plans from containing policies that seek to restrict new development in hamlets and very small settlements to avoid a proliferation of new buildings in the countryside and additional traffic on country lanes.

Green Belt and environmental considerations

38. My preliminary conclusion is that exceptional circumstances exist for the release from the Green Belt of all the relevant site allocations. The plan seeks to meet overall housing need in the right places through a logical and evidence-based spatial strategy that promotes sustainable development patterns. The allocations are well chosen and do not represent unrestricted sprawl; they constitute planned growth. In no instance do they result in neighbouring towns merging. They do represent encroachment into the countryside, but the allocations are of such a size that defensible boundaries and structural landscaping and good quality open space are capable of being designed into the schemes' masterplans, such that the impact on the Green Belt can to a degree be mitigated.

39. There are no reasonable alternatives to the approach taken in the plan to the alteration of the Green Belt. Alternatives would locate development in the wrong places, resulting in longer journeys, higher costs, additional pollution, and additional pressure on existing settlements and their facilities; they would promote much less sustainable development patterns.

* A proposed modification addresses the need for compensatory measures in relation to the alteration of Green Belt boundaries and this is included in Document CSD13.

40. As regards protected sites, the scale of the allocations provides the space and opportunity to provide adequate mitigation, for example in providing adequate buffers to, and relieving public pressure on, nearby SSSIs and limiting landscape impact.

41. The evidence does not suggest that the plan would have a deleterious effect on any AONB or its setting.

Employment land

42. The submitted plan is not positive enough in its approach to the provision of employment land, particularly given the evidence of demand.

* Main modifications are required to make it clear that the employment land requirements are minima, with the requirement for Thame increased to a minimum of 3.5ha. The suggested wording can be included in the schedule of main modifications for consultation.

An edge road for Watlington

43. The plan establishes a safeguarding line (as modified) for an edge road for Watlington. The line crosses into the neighbouring parish of Pyrton but is not included in Pyrton's Neighbourhood Development Plan.

44. Watlington's narrow streets are under extreme pressure from vehicles passing through, severely detracting from its historic character, harming living conditions and creating a hostile pedestrian environment. The edge road, funded in part by development and part from the Chalgrove allocation, would help relieve this situation. Having seen the safeguarded area, I do not consider that

the route would impinge to any harmful extent on the character of Pyrton or its attractive rural surroundings. Its inclusion in the plan is sound.

Climate change mitigation

45. Other than described below, the plan adequately addresses this issue. The spatial strategy seeks to locate new development in sustainable locations which provide travel choices and help to reduce journey lengths. Its strategic allocations are of a size to sustain social and community facilities and support public transport.

46. Carbon and energy impacts are not clearly addressed in the submitted plan and the Council have put forward a new policy on the subject (new DES11 in document CSD13), partly modelled on that in the Oxford City Local Plan.

* There are also proposed amendments to DES9 regarding sustainable design which can go forward as main modifications for consultation.

Biodiversity

47. Document CSD13 contains modifications in respect of biodiversity net gain.

* The site allocation masterplans need to actively seek biodiversity gain and avoid habitat fragmentation and this needs to be included as a main modification.

Concept plans for the strategic allocations

48. These are only valuable if they accurately reflect the realistic development plans of the site promoters as well as the Council and the County Council.

* The Council have discussed these with the site promoters. The relevant policies need to make clear that they are for illustrative purposes only.

Changes to the Use Classes Order

49. Revisions to the Use Classes Order come into force on 1 September 2020 which among other things create a new Use Class E, which encompasses shops, restaurants, financial and professional services, indoor sport and fitness, medical and health facilities, offices, research and development and light industrial use. A new Class F.1 is created which includes learning and non-residential institutions and a new Class F.2 which includes local community uses. Changes between activities within a Use Class do not require planning permission.

* I asked the Council to consider the implications for the plan's policies; their assessment is in Document PSD66 and my response is in IC10. The Council have now made the appropriate wording changes and these can go forward as main modifications for consultation.

A note on Covid-19

50. I did not spend time on this subject at the examination hearings because any discussion at present can only be speculative. If it turns out that there is a greater propensity for home working in the future, that would not obviate the need for everyone to have a decent home. In any case only a proportion of

people are in jobs that can be managed substantially from home. Further, a spatial strategy based on a dispersal model would have significant implications for the market towns, villages and countryside and the infrastructure that serves them. The appropriate response to this issue is through the monitoring process.

Main Modifications

51. I now invite the Council to finalise the main modifications for consultation and sustainability appraisal, agreeing final wording with me as necessary. It is usually best to group all the modifications relating to a particular policy under one MM (main modification) number, including any consequent changes to the supporting text, appendices and glossary. This keeps the number of MMs down and enables people to see all the effects of a particular modification. Through the Programme Officer, I would be pleased to help you to get the schedule of main modifications into order for public consultation.

52. There will be an opportunity for the public and stakeholders to comment on the main modifications during the consultation period. I will consider the responses to that consultation and any associated sustainability appraisal before finalising my report.

Jonathan Bore

INSPECTOR