

OXFORDSHIRE STRUCTURE PLAN 2016
Deposit Draft September 2003

Examination in Public
12 October- 27 October 2004

REPORT OF THE PANEL

December 2004

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PREFACE

1. The Deposit Draft Structure Plan 2016 for Oxfordshire (DSP) is intended to replace the Oxfordshire Structure Plan 2011 adopted in 1998 and the alteration to it adopted in April 2001. The DSP was placed on deposit for a period of 6 weeks from 26 September 2003, and just over 2680 individuals and organisations made representations.
2. Prior to the Examination in Public (EIP), the Oxfordshire County Council issued in April 2004 a number of proposed pre-EIP changes to the DSP, and these were also made available for public comment. During the EIP and in this Report the Panel has considered the effect these proposed changes would have on the DSP.
3. The Panel was appointed by the First Secretary of State to conduct an EIP into selected matters arising out of the DSP. Based on the objections and representations received, a total of 6 separate matters were selected by the Oxfordshire County Council for examination, in consultation with the Panel. We were also consulted on the choice of participants to discuss those matters. This Report deals only with the matters examined, and not with all the issues raised in representations, which will be for Oxfordshire County Council to consider before adopting the Plan.
4. The final list of Matters and Participants is reproduced as annex B to the Report. All participants, including the County Council, were invited to submit written statements prior to the EIP. These were circulated in advance to all those participating in the relevant sessions. Additionally, written statements submitted by interested parties not participating in the discussions were also circulated.
5. A list of Core Documents forming important background material to the EIP is at annex D. These, together with copies of all participants' statements, were held in the EIP library and were available for inspection prior to and during the EIP.
6. A preliminary meeting of participants and other interested parties, chaired by the Panel, was held on 1 September 2004. The purpose of the meeting was to explain the nature of the proceedings and to allow an opportunity for participants to raise any questions on how the EIP would be conducted. Prior to the EIP we undertook an unaccompanied tour of the county to familiarize ourselves with the area, taking in locations and places relevant to the matters being examined. A copy of the tour details was made available for inspection to interested parties as a core document.
7. The EIP itself was held over three weeks between 12 October and 27 October 2004. A copy of the timetable is at annex C. All sessions at the EIP were recorded.
8. The Chapters in this Report follow broadly the sequence of matters as discussed at the EIP. We have not sought to provide a full account of all the proceedings during the EIP, nor to summarize all the representations and participants' statements. Our

Report concentrates on the main arguments we have addressed and upon setting out the reasoning behind our conclusions and recommendations. We have aimed to set out clearly our proposed changes to the presentation and wording of policies in the Plan in bold text at the end of each chapter, making further reference where appropriate to recommended changes to the wording of the supporting text.

9. The Panel would like to express their appreciation of the work of the Panel Secretary, Roger Chetwynd, in organising the EIP and the production of this Report. Our thanks also go to the Programme Officer Tony Trubshaw, to officers of Oxfordshire County Council for their assistance in responding to the Panel's requests, and to all participants for their constructive contributions to the EIP.

CHAPTER 1: OVERVIEW

1.1. The Deposit Draft Structure Plan to 2016 (the DSP) will be the last Structure Plan for Oxfordshire, and the last to be processed in the South East Region before being replaced by the new system of Regional Spatial Strategies and Local Development Frameworks introduced by the Planning and Compulsory Purchase Act 2004. This fact loomed large in the background to all the Matters discussed at the EIP. We have had some regard to the issue of “what happens next” in writing this Report, and our conclusions on this are set out in Chapter 2. We have, however, seen the main thrust of our work as being to examine the policies and proposals in the DSP in the context of their role within the present development plan system.

1.2. It often arises that there is not an ideal time to prepare a Structure Plan, or any plan. In the case of the DSP, its relevance was compromised by several activities going on in parallel which affect a large proportion of the content. At the strategic level, work towards the new South East Plan and the strategy for Central Oxfordshire as part of that will provide new and more up to date housing requirements and other strategic guidance for the county. On transport the DSP was prepared without the benefit of the outputs of the Transport Networks Review and the appraisal of the Oxford Expressway project. These would, however, feed into the Local Transport Plan for which the Structure Plan is supposed to provide a strategic framework. On minerals new strategic guidelines which provide the direct context for the provision in the county were in the process of being considered at regional level at the time of the EIP. At local level, at the time of the EIP it was apparent that Local Plans in all the Districts were also being processed in parallel with the DSP, several of them looking forward as far as 2016.

1.3. Against this background it is fair to ask what purpose is served by the DSP. Some felt it should be a bridge between the old and new systems by providing policy which anticipates the new framework. Others saw it as a “last throw of the dice” for the county Structure Plan before it was overtaken by the new arrangements. We do not consider the DSP is sufficiently adapted to the new arrangements and the fresh thinking that will be required to form the bridge that some were looking for. For example, not only may new spatial options need to be considered, there will also be new procedural requirements, including Strategic Environmental Assessment, which the DSP will not have complied with. For these reasons we have stressed the interim nature of the Plan. We do consider, however, that on balance it is a worthwhile exercise that will provide a reasonably up to date framework for delivering development already planned, and some certainty going into a period of change.

1.4. The Policies and explanatory text of the DSP are much more concise than those of the adopted plan and this has for the most part improved the clarity of the document. The objectives set out under four broad aims in paragraph 1.26 also provide greater clarity than the broad aims of its predecessor. We have used these objectives in assessing whether the DSP fulfils its purpose, and sought to rectify inconsistencies between the Policies and the objectives which they are intended to support.

1.5. Overall in our conclusions we recognise the continuity that the DSP strategy provides with previous Oxfordshire Structure Plans, and we have endorsed its main features. Broadly, our conclusions and recommendations:

- support the county housing total and its distribution as amended by the pre-EIP changes
- endorse the aspirations on affordable housing and the use of previously developed land while leaving flexibility at the local level
- develop and sharpen the policies relating to the economy
- make the transport policies more incisive and better related to the priorities of the plan
- make some refinements to the environmental policies which are already well supported
- propose a different approach to determining locations for sand and gravel working
- emphasise the interim nature of this Structure Plan pending the new RSS, and suggest that a more fundamental review of spatial options will be needed for accommodating the county's further development.

1.6. With regard to the county housing total we have accepted the view that this should be kept generally in line with the existing guidance in RPG9¹ and should not be altered in anticipation of new regional requirements which will emerge from the South East Plan. We regret that there is no more rational basis for the county total, in that no analysis has been made to establish how much additional housing is required to meet the needs of the county and its people, which is a stated objective of the Plan. The failure to address this perhaps reflects a view which regards housing requirements as something imposed by the regional and national level. It is to be hoped that in future intelligence about the needs of the county and its people will contribute to the regional process so that the new Regional Spatial Strategy, once adopted, will be seen as reflecting those needs and not merely an imposition from outside. This will be important, given that delivery will have to be achieved at the local level without the mediation of a Structure Plan.

1.7. The housing distribution proposed in the DSP marked an important shift from that of the adopted Plan, reducing the proportion of the total allocated to the “country towns” and increasing the proportion in Oxford City with the adjacent urban extension. This may be seen as a recognition both of the capacity of the City to accommodate higher provision and of the need and demand for additional housing in Oxford. In response to views put forward on the deposit draft and to emerging information about additional capacity within the urban area, the pre-EIP changes added a further 1000 homes to the Oxford City total. One consequence of this is that the overall requirements could be met without resorting to the proposal for an urban extension into the Oxford Green Belt. However, we endorse that conclusion only in the context of the presently identified requirements up to 2016. In future there will no doubt be continuing strong demands related to Oxford, and limitations on the scope

¹ Following Regulations made under the Planning and Compulsory Purchase Act 2004, RPG9 now formally has the status of the Regional Spatial Strategy for South East England. Throughout this report, however, we refer to it by its familiar titles of “Regional Planning Guidance” and “RPG9”, as distinct from the emerging new Regional Spatial Strategy, to be known as the South East Plan.

for finding yet more capacity within the City or for steering more development to the country towns. We consider it inevitable, therefore, that future plans will need to address new spatial options within central Oxfordshire, including those which involve making changes to the Green Belt. Such a choice should only be made after a thorough strategic appraisal which shows it to be the best sustainable option, but if that is done we see no reason why it should lead to any general weakening of the protection of the Green Belt, as feared by some respondents.

1.8. The policies towards employment development are one area where we found the EIP has enabled us to recommend improvements to the DSP. Our proposals seek to give greater clarity about what development is required, rather than simply to frame limitations on what will be provided. This in our view also helps to address an important aspect of sustainable development. Unqualified use of the concept of “restraint” tends to encourage the idea that all development is invariably damaging and should therefore be avoided as far as possible. It is obvious, however, that development is an essential component of sustainable development, as is amply reflected in the objectives of the DSP. The key is to identify what development improves sustainability, and to ensure that where development takes place it produces beneficial impacts, and that any adverse impacts are properly dealt with. We believe that the DSP makes important progress towards this more intelligent approach to implementing sustainable development, and our recommendations are designed to advance this further. It follows that if the Structure Plan policies are fully applied, the county will get the development it requires but excessive and damaging development will be avoided.

1.9. Similarly with transport, we have sought ways to relate the transport policies more directly to the objectives of the Plan, despite the limitations on the detail and precision of what can be included at this stage. It may be that the County Council will find further improvements to make in the light of the most recent studies when adopting the Plan. There could be a concern, however, about such content finding its way into the Plan without having been subject to consultation and discussion at the EIP. At the local level, concerns about transport and other infrastructure attended the discussion of development at almost all the locations considered at the EIP. This often contributed to a local reluctance to accept further development, even where the need for it was acknowledged. Some of the infrastructure will be provided by carrying out development already planned, or which will be brought forward to meet Structure Plan requirements. While this will be assisted by Policy G3, we consider clarity about infrastructure requirements will need to be carried through in Local Plans and new Local Development Frameworks.

1.10. At a broader level, we are aware that there are concerns throughout the region about the need for infrastructure funding to support increased levels of development. Oxfordshire is not alone, therefore, in needing to make the case for infrastructure investment. This is all the more reason for the Structure Plan to be clear and positive in its development strategy so that transport and other infrastructure requirements can be identified as emanating from the needs of the county and its spatial development priorities. Our recommended changes to the transport and other policies are intended to improve the effectiveness of the Plan in this role.

1.11. The county's environmental assets, including the built heritage, landscape and biodiversity, are well established at the heart of the Structure Plan's approach. As a result the discussion of environmental issues did not produce major contentious issues but focussed on specific suggestions for improving the detail of particular Policies, particularly in the light of the latest Government guidance. Our recommendations reflect this and are in effect fine tuning of Policies which are generally well supported. In relation to minerals, we found the DSP proposals subject to more fundamental challenges. Although the strategic resource area approach, based on established areas of mineral working, may have been found effective in the past, it is no simple matter to roll this forward to a new phase of provision involving the identification of a new area. We have concluded that the identification of such areas can only be done satisfactorily after a more searching process of assessment and evaluation than was appropriate to the Structure Plan. Our conclusions reserve this process to the new Minerals and Waste Development Framework although the work that has already gone into identifying and appraising areas for the Structure Plan will clearly help to provide the starting point.

1.12. We have stated in paragraph 1.3 above that the Structure Plan is a worthwhile exercise, even though it will have a short life before being superseded. Its value will be in signalling the continuing priorities for the county's spatial development, and particularly for infrastructure investment to support them. For the local level, it would in our view be counter productive to arrest the progress currently being made on completing up to date Local Plans, in order to re-start work on new LDFs to implement the revised Structure Plan. We consider the priority should be to concentrate on delivering the provision, including infrastructure, already planned and reaffirmed or extended in the new Structure Plan. The Plan will then provide a framework against which to monitor progress and inform the eventual review of local policies through the preparation of new LDFs once a new strategic context has been set by the South East Plan.

CHAPTER 2: GENERAL STRATEGY

Introduction

2.1. Matter 1 of the EIP provided an opportunity to debate the principles of planning policy for Oxfordshire, and to test the soundness of the Deposit Draft Structure Plan (DSP) as a basis for planning policy in the county up to the year 2016. The issues inevitably linked to those discussed under all the other matters, especially Matters 2 and 3 on Housing and the Economy. In this Chapter we present our conclusions and recommendations regarding the overall objectives, strategy and general policies for development contained in Chapters 1 to 3 of the DSP.

Aims and Objectives

2.2. In considering the likely effectiveness of the strategy, we have had regard to the aims and objectives as set out in paragraph 1.26 of the DSP. The aims correspond broadly with the four national aims for sustainable development concerned with the environment, resources, social progress and economic growth, although the wording, and hence the emphasis, differs from that set out by Government in Planning Policy Guidance Note 1. There are, however, objectives amplifying each of the aims which arguably cover all the necessary aspects of sustainable development in a form relevant to the particular circumstances of Oxfordshire. As DSP paragraph 1.27 succinctly notes, it is finding the right balance between the objectives that is the key.

2.3. Although some participants took issue with the wording of the objectives, in general they command wide support. Few would dispute objectives such as 1(i) “to provide effective protection for Oxfordshire’s biodiversity, landscape and heritage”, 2(i) “to locate development where it can reduce the need to travel...etc”, 3(i) “to provide for sufficient new dwellings of an appropriate size and type for Oxfordshire’s residents...” or 4(ii) “to provide for development to meet the economic needs of the county’s residents and local businesses”. Unfortunately, such objectives tend to beg the question of what is required to achieve them, and this is where views diverge. We comment further on the housing and employment objectives in Chapters 3 and 5. We also have more to say at paragraphs 2.37 to 2.39 on the need for a more specific and measurable set of policy targets and indicators to enable the Structure Plan to be properly monitored and reviewed in future. As it stands, the Structure Plan strategy is open to wide interpretation about what it has achieved and will achieve, and this led to various assertions and counter-assertions at the EIP.

Oxford and the country towns strategy

2.4. The DSP continues and develops the approach of the adopted Structure Plan 2011. As well as rolling forward the development provision for an additional five years the DSP makes a number of changes, adding Grove to the locations for significant additional housing, and emphasising the concentration of development on the main urban areas, including Oxford, for which it proposes higher housing provision than in the adopted Plan. As deposited, the DSP also included the proposal for an urban extension to the south of Oxford but the County Council withdrew this proposal in its proposed pre-EIP changes.

2.5. Views were sharply divided about the effects of the current strategy, and hence about the appropriateness of the DSP for the future. The County Council argued that the “country towns strategy”, which seeks to steer growth to Banbury, Bicester, Didcot and Witney, has been successful since it was introduced in the 1970s. In support of this view, it is argued that the economic position of the City of Oxford and of the whole county has improved in both relative and absolute terms. There has been a reduction in the proportion of country towns residents’ commuting to Oxford, while the ratio of resident workforce to jobs within the City has increased. The country towns themselves have also seen major improvements, although further improvements particularly to infrastructure are required. There is considerable support for the strategy from across the county, on the grounds that it succeeds in protecting the environment, and particularly the historic character and setting of Oxford.

2.6. Against this view a number of participants argued that the strategy fails to recognise Oxford’s regional and national economic importance and its role as the focal point of a “city region”. The City Council pointed to the fact that the number of jobs in Oxford has changed little over the last thirty years, while other participants drew unfavourable comparisons with the performance of Cambridge and its sub-region. As for the country towns strategy, housing growth in the towns has not been matched by provision of infrastructure and community facilities, or by employment growth, with the result that commuting out of the towns has increased. The actual delivery of housing in the country towns has fallen well below the rates provided for in the Structure Plan, whereas Oxford City has significantly exceeded its planned housing provision. Thus the improvement in the jobs/ housing balance in Oxford could be said to have occurred in spite of the strategy rather than because of it.

2.7. We take the view that the country towns strategy needs to be seen in its evolving context. The causes of earlier under-delivery are being tackled, in collaboration between GOSE and the two District Councils most concerned. At Didcot, for example, the 2001 Structure Plan alteration and the forthcoming joint Local Plan inquiry, together with completion of the new town centre development, should give a major boost to delivery. The DSP also makes a significant adjustment to the spatial strategy: whilst in the adopted Structure Plan the four towns of Banbury, Bicester, Didcot and Witney account for 46% of the housing provision, this falls to 38% in the DSP. Oxford’s share rises from 10.5% to 17.4% in the DSP (as amended by the pre-EIP changes). This may be seen as a recognition of the limitations of the scope for dispersal to the country towns, and a response to calls from the relevant District and local Councils for a period of “consolidation” beyond the year 2011. At the same time, it also recognises more fully the development needs and potential of Oxford. We comment further in Chapters 4 and 5 on the housing distribution and employment issues arising from the strategy. The longer term implications are considered at paragraphs 2.23 to 2.31 below.

Restraint

2.8. One subject of conflicting assertions was the approach of restraining the overall level of development embodied in Policy G1, which was highlighted in question a) of EIP Matter 1. Some argued that restraint was essential in order to achieve the aims of the Plan for protecting the environment and conserving resources. Some also see restraint as important in helping to avoid overheating of the county’s

strong economy. The District Councils found that the use of the word “restraining” in the Policy, which derives from Policy G1 of the adopted Structure Plan, sends a clear signal for development control purposes. Developers argued, however, that the concept of restraint was fundamentally at odds with the objectives of providing the housing and employment growth which the county needs, and also conflicted with regional and national priorities.

2.9. There are undoubtedly many restraints to development in Oxfordshire, and these are reflected in many of the policies of the DSP. Examples are to be found in policies G1 to G5 as well as in the environmental Policies EN 1 to EN 10 and elsewhere. As the County Council points out, limitations or restraint are implicit in the overall amount of housing to be provided to meet RPG requirements and in policies to protect the environment. The question is whether the general restraint policy in G1 adds anything useful, and whether its meaning is clear. It clearly should not mean restraining housing development below the level required by RPG. The DSP policies E1 to E5 contain their own limitations, but as employment development needs or the desired number of jobs are not quantified, there is no way of knowing what restraint of the level of development is intended to mean in practice for employment.

2.10. We conclude that the necessary constraints to development are well reflected in the various Policies of the DSP, and that applying an additional layer of general restraint through the wording of Policy G1 is unnecessary. At best it is superfluous, while at worst it may inhibit development which is not in itself harmful and which may be required to meet the Plan’s objectives. Indeed it is possible that a culture of restraint for restraint’s sake has contributed to the failure to deliver planned levels of development in the past. In our recommended revision to Policy G1 at **R2.1**, we propose wording which seeks to bring out more clearly the relationship between delivering the development required and securing environmental objectives.

Smaller settlements and rural areas

2.11. Complementing the overall emphasis on concentrating development on the main urban areas, the final sentence of DSP Policy G1 seeks to provide for limited development in rural areas. This is a change from the adopted policy G1 which refers to “appropriate” provision. Since the DSP was prepared, updated Government guidance has appeared in the shape of Planning Policy Statement 7: Sustainable Development in Rural Areas. A number of participants argued that Policy G1 pays insufficient regard to the needs of rural communities and does not reflect PPS 7. Similar objections were raised to Policy G5, which says that development away from existing settlements or outside areas allocated in the development plan will not be permitted. This also differs from the previous version which referred to sporadic and ribbon development.

2.12. There is very wide support for the Structure Plan’s emphasis on protecting the character of villages and the countryside, and on the need to ensure that development there is tightly controlled. There is also a concern, however, that small communities have legitimate development needs for housing, employment and other facilities to ensure their continuing viability. While sustainable development means co-locating the bulk of jobs and homes in the larger urban areas where they can be well served by

non-car modes of transport, for the small settlements it may also mean allowing sufficient development to provide local jobs and maintain the viability of local shops, schools and other services. This can help minimise the need to travel further afield, particularly in areas poorly served by public transport. The Country Land and Business Association (CLA) develop this view further, seeking “more dispersed, organic growth” of rural settlements as an alternative to new urban extensions.

2.13. We accept the County Council’s view that, taken together, the DSP policies do seek to address the needs of rural areas. Some 36% of the proposed housing provision is for the areas of the county outside the main towns and growth locations identified in Policy H1. Also policies E2 and E3, including the pre-EIP changes, seek to address the employment needs of small towns and rural areas. These Policies were discussed in more depth under Housing Distribution, Matter 2B(g) and Employment, Matter 3, and we consider them further in Chapters 4 and 5. Under the general strategy, we note that the Oxfordshire Structure Plan, unlike some others, has never defined a formal hierarchy of market towns and rural service centres with policies for determining the development appropriate to them. We do not see a case for trying to introduce such an approach now. Local Plans have clearly had to deal with the development needs of rural areas within the present framework. We conclude, however, that some minor amendment of Policies G1 and G5 would help to clarify them and bring them more into line with the guidance in PPS 7.

2.14. Policy G1, instead of speaking of permitting limited development, should support development in the smaller towns and villages of an appropriate scale to meet the needs of local communities and businesses. Our recommendation **R2.1** for the revision of Policy G1 reflects this. For Policy G5, we conclude that the second sentence prohibiting any development away from existing settlements is unnecessary, given the fact that the first sentence protects the countryside from harmful development and the second part of the policy defines the development that will be given consideration. We note the County Council’s view that a reversion to the policy wording of the adopted Plan would be acceptable. However, we recommend at **R2.2** that Policy G5 is amended in order to reflect more fully the approach of PPS 7. Appropriate adjustments should also be made to the supporting text in paragraph 3.17.

Infrastructure

2.15. The third question under Matter 1 concerned the requirement in Policy G3 for phasing of infrastructure with development. At various points in the EIP there was a good deal of discussion about infrastructure requirements generally, and the need to ensure that development does not take place unless the necessary infrastructure and services are also provided. This is one of the tenets of the Government’s approach to Sustainable Communities, and there was little argument over the principles. Developers accept, for example, that funding for relevant infrastructure provision through planning obligations is an integral part of the development process. Many of the concerns expressed in the discussion centred on past performance. For example, in a number of cases housing development in the country towns had not brought with it an appropriate expansion of town centre facilities or other local services. In other cases the lack of key infrastructure provision had delayed development, contributing to the county’s low housing delivery. Many of these problems were now being overcome but others remained. The most commonly cited symptoms of such

problems are traffic congestion and a deteriorating environment while long wanted highway or transportation improvements are still awaited.

2.16. A key issue for the county, therefore, is trying to secure the infrastructure to match development. Some representations call for existing infrastructure deficits to be rectified before any further development is accepted. Others seek provision “up front” of key infrastructure before development begins. While in some cases what is required is already in public programmes or developer funding has been secured, in others there is a funding gap or the resources needed are not within the control of the local authorities. Oxfordshire is not alone in experiencing these concerns, and cannot expect to receive more favourable consideration for additional Government funding of key infrastructure than other areas in a similar position, or those accommodating major growth areas.

2.17. Against this background, DSP Policy G3 takes the only practicable approach. The fact that a similar policy is included in the adopted Plan suggests that it may not have been wholly effective in the past. The need now is not only for the Policy to be followed through in the delivery of future development, but also for the Structure Plan’s spatial priorities to give clear direction to funding agencies, utilities and service providers as to priorities for investment within the county. This applies especially to transport, which we consider further in Chapter 6. The only respect in which Policy G3 needs improvement is the phrase “in a phased manner as the development progresses” in the first paragraph. This could be interpreted as meaning that all infrastructure should be provided in a phased manner, whereas in reality this will only be appropriate in some cases. In others infrastructure provision may be triggered when development has reached a certain stage, or it may need to be in place before any development commences. Our recommendation **R 2.3** proposes revised wording to clarify this.

The Oxford Green Belt

2.18. Policy G4 was not the subject of a separate discussion at the EIP, but the Green Belt emerged as a key issue in the debates on housing in Oxford and Central Oxfordshire and on the economy. We have found it useful to bring the main Green Belt issues and our conclusions on them together in this Chapter of our Report.

2.19. The boundaries of the Oxford Green Belt were finally established relatively recently, in Local Plans during the 1990s. The Green Belt and the country towns are essentially complementary parts of the Structure Plan strategy. This has looked to development at the towns beyond the Green Belt as an alternative to Oxford, given the tight constraint on its physical expansion. While this is a logical approach, and one which has been followed through effectively in Structure and Local Plans, the tensions underlying it are clearly apparent. Oxford itself, as a world ranking economic and cultural focal point, has continued to swell within its boundaries, producing more than its planned allocation of housing, and seeking further space for economic development. At the country towns, progress has been slower, suggesting that decentralising growth from Oxford is not all that easy to achieve. In the south of the county, however, notable concentrations of employment at, Harwell, Milton Park and other locations are clearly part of the wider economy of the Oxford sub-region, and continue to exert a buoyant influence.

2.20. The Green Belt itself is far from being the rural vacuum surrounding the City that the policy might imply. The numerous Green Belt villages are home to many participants in the high value knowledge based economy or, as one participant put it, the “intellectual power house” of Oxford’s reputation. There are also thousands of Oxford-related jobs within the Green Belt, whether in small businesses in villages or at larger establishments such as at Culham and the Oxford Brookes campus at Wheatley. Key development proposals in the Green Belt associated with the Oxford economy appear to have drawn a pragmatic response. Many may be rejected as inappropriate development in the Green Belt. In some cases reliance has been placed on achieving an acceptable outcome within the approach in Annex C of PPG2 to infilling and redevelopment at those employment locations which are designated as major developed sites within the Green Belt. In others, exceptions have been accepted, as evidenced by the County Council’s support for the University’s Business and Science Park proposal at Begbroke and for the release of Green Belt land for development to meet BMW’s requirements.

2.21. A further response to the tensions discussed above was the proposal for an urban extension to Oxford on land in the Green Belt south of Grenoble Road, which was included in the deposited version of the Plan. Developers put forward several other proposals for major development in the Green Belt, both for housing and employment. These included locations to the north of the City at Kidlington, at Shipton Quarry and around Oxford Airport, and to the south at Sunningwell and Kennington. There was also a proposal for a new settlement on green field land beyond the Green Belt to the east of Oxford. The promoters of these proposals argued at the EIP that they represented more sustainable options for meeting the county’s development needs, that they were more readily deliverable than further development at the country towns or the Grenoble Road proposal, or that they responded to the need for a longer term approach and a higher volume of development than the DSP was proposing. Some participants argued that there should be a systematic review of the Green Belt to find the most sustainable options for further development related to Oxford. The Grenoble Road proposal does not appear to have resulted from such a review but from an *ad hoc* decision on the need for an urban extension. The consequent need for a Green Belt boundary review is merely noted in paragraph 3.9 of the explanatory text.

2.22. In the event, after considering the consultation responses to the deposit draft, the County Council withdrew the Grenoble Road proposal in its pre-EIP changes, finding that the housing requirement could be met from additional potential within the urban area. On that basis, the County Council did not consider that there were exceptional circumstances justifying the release of land in the Green Belt for housing up to 2016. Within the limited horizons of the DSP, we have reached the same conclusion, in the light of our consideration of the housing provision and distribution issues in Chapters 3 and 4. As regards employment, the tensions noted above clearly remain, and Green Belt constraints will no doubt continue to tax the ingenuity and ability to compromise of both planning authorities and business. For the time being, however, in the light of the discussion of the economy under Matter 3 we conclude that there is not an overriding need for a strategic release of Green Belt land for employment in this Structure Plan. We would emphasise, however, the short term nature of these conclusions. In order to set the issues in context, it is necessary to look

beyond the DSP time horizon, and to the transition to the new development plan system.

Beyond 2016

2.23. In paragraphs 2.18 to 2.24 the DSP gives some pointers to the period beyond its formal time horizon of 2016. This attracted a number of criticisms. SEERA and a number of other participants were anxious that these paragraphs should not pre-empt options for the new regional and sub-regional policy framework that will be set by the South East Plan. Others objected to the possible further development canvassed at Didcot, Bicester and Grove, or argued that, in seeking to prolong the Structure Plan strategy beyond 2016 the paragraphs were inappropriate. We take the view that, while possibilities for development at some locations are considered, paragraphs 2.18 to 2.24 are of very limited value, as they make no attempt to assess the likely overall need for development in the county beyond 2016, or to appraise the strategic options in terms of their sustainability. The paragraphs will in any case need to be revised or replaced, as they have been rendered out of date by the emerging situation of the Regional Spatial Strategy for the South East (the South East Plan) which will cover the period to 2026.

2.24. As part of the work on the South East Plan, SEERA has explored a number of assumptions about the overall levels of housing growth ranging from some 10% to 40% above those currently reflected in RPG 9. Whatever the level of development eventually arrived at, the general expectation is that it will need to be significantly higher than the present provision. This was foreshadowed as early as 2001 in paragraph 8.3 of RPG 9, and there have been many other signals since, all suggesting that the South East as a whole will need to increase its housing output. What the new regional housing requirement, or Oxfordshire's share of it, should be is beyond the scope of this Report. But in considering how the Structure Plan should address the medium and longer term, it is important to take a realistic view of the likely needs of the county.

2.25. In Chapter 3 below we express our concern about the lack of any analysis of whether the DSP housing provision will enable the Plan's objectives to be met. Under the "old" development plan system, Government guidance encouraged unquestioning acceptance of RPG housing figures, and these may have come to be regarded as something imposed from outside. The new arrangements for Regional Spatial Strategies require a more positive input from the county and local level to the regional strategy process. For such an input, we turned to the County Council's report on the Central Oxfordshire Strategy as part of the South East Plan, which became available during the EIP. That document suggests a vision for the area which, in broad terms, corresponds to the aims and objectives of the DSP. It does not reach a conclusion on the overall level of development that should be sought, but reviews options for locating further growth, either by the development of larger settlements beyond the Green Belt – effectively Bicester and Didcot, or by one or more significant urban extensions at Oxford.

2.26. Whatever strategy is to be pursued, the DSP, when finally adopted, will clearly provide the point of departure. The County Council have suggested that the Plan will help to avoid an hiatus if for any reason there is delay in putting the new strategy in

place, and that the findings from the EIP can usefully feed into the South East Plan. On the same theme, a number of participants called for the DSP to form a bridge from the old system to the new. Others, however, argued that the Plan would have a strictly limited life and should be regarded as an interim document pending the new South East Plan. This brings us back to paragraphs 2.18 to 2.24 and what should replace them. If the Structure Plan is to form a bridge to the new Plan which will run to 2026, it has to have some regard to the relevance of its policies beyond 2016.

2.27. In the light of our conclusions elsewhere in this Report, we consider that the DSP strategy up to 2016 just, but only just, meets the development requirements of RPG 9 and the needs of the Oxfordshire economy. In doing so it relies heavily on assumptions about urban capacity within Oxford, on the ability of the country towns to absorb further growth, and the flexibility of the economy of Oxford in finding ways to meet its development needs. We do not consider, however, that the EIP and the material before us give any grounds for expecting that the same strategy or a variant of it will necessarily be adequate to take the county forward beyond 2016, particularly if it is concluded that the county or the Central Oxfordshire sub-region needs to provide a higher overall level of development. By then it appears that the country towns strategy may have run its course, with new thresholds for infrastructure provision likely to have been reached. We also note that the local authorities concerned, and other stakeholders, are looking for a period of consolidation beyond the medium term. Assuming that the Central Oxfordshire vision of fostering and developing the area's economic strengths is maintained, new directions are also likely to be needed for employment development.

2.28. As the County Council said in its opening statement on Day 1, with any development strategy it is worth asking the question: what happens at the development plan review after this one? One answer is that the new Local Development Frameworks that will supersede Local Plans will be subject to the requirement for Strategic Environmental Appraisal (SEA) as well as sustainability appraisal. The options for development will need to have been assessed comparatively in terms of their sustainability and environmental implications. One thing that is apparent from the submissions made to the EIP is that there is no shortage of proposals for where development can be provided, each claiming its own sustainability advantages, whether in terms of transport, using previously developed land, protecting the Green Belt, or the benefits of the development itself. We appreciate that the issues in deciding on a development strategy are complex, and that the County Council has sought to evaluate options on a strategic level. We conclude, however, that a more detailed and comprehensive review of options, including those that involve making changes to the Green Belt, is needed to provide a sound rational basis for development choices in the longer term.

2.29. Such a review will provide an important opportunity to get to grips with the county's future development needs. It should seek to provide answers to the questions about feasibility and relative sustainability of expanding Oxford or spreading development beyond the existing Green Belt, or whether a judicious combination of both approaches is preferable. It should be conducted in a transparent way, with opportunities for community and stakeholder involvement before decisions are made.

2.30. In looking ahead to the next phase of plan making, therefore, we consider that the Structure Plan should not seek to favour particular spatial options and close others. The DSP strategy is clearly an interim plan as it will inevitably be overtaken by the South East Plan once the latter is in place to provide a strategy looking further forward beyond 2016. The review of development options to which we have referred above will have a central role in delivering the Central Oxfordshire part of the strategy. Such a review is not likely to be completed in time to feed into the strategy but should perhaps be seen to follow as part of an iterative process once the scale of development required has been decided regionally following a local input. In any case the detailed choices involved about the location of development would appear more appropriate to the local level. With no Structure Plan in future, it will fall to the Local Development Frameworks to make these choices. Given the close interrelationship between Oxford City and the surrounding districts, it is hard to see how this can sensibly be approached on anything other than a collaborative basis. Whether joint Local Development Documents are the way forward, or some other approach to getting an agreed plan, it is important that the arrangements are sufficiently clear to avoid the kind of impasse that was created at Didcot under the previous Structure Plan. For example the considerable divergence of views among the different local planning authorities about the merits of an urban extension to Oxford will need to be resolved.

2.31. We recommend at **R 2.4** that DSP paragraphs 2.18 to 2.24 are replaced by new explanatory text referring to the interim nature of this Structure Plan, the emerging South East Plan and Central Oxfordshire strategy, the need for a thorough comparative appraisal of the spatial options for meeting future requirements for development to 2026, and outlining proposals for joint arrangements to ensure effective delivery through Local Development Documents.

Implementation

2.32. The final question for Matter 1 of the EIP considered whether the DSP provides sufficient guidance on how the Plan will be delivered. We have already touched on issues of delivery arising from the under achievement of levels of development planned in the previous Structure Plan, and concerns about securing infrastructure improvements. DSP paragraphs 2.25 to 2.28 about delivering the strategy are exclusively concerned with infrastructure provision, particularly transport. We comment in Chapter 6 about the shortcomings of the DSP in setting out clear and specific transport priorities for implementing the Plan, leaving most of this to be supplied by the Local Transport Plan following parallel studies. While there may be little scope for amplifying the DSP in this regard, there are other aspects of implementation and delivery which need to be considered.

2.33. The DSP is being progressed in parallel with Local Plans in all the Districts, with Public Inquiries taking place in 2004 or 2005. While those Local Plans were prepared pursuant to the adopted Structure Plan to 2011, some, including that for Oxford City, look forward to 2016 in order to provide a 10 year horizon. Assuming the Local Plans proceed on the timetables that have been indicated to us, adoption of the new Structure Plan is likely to come too late to be formally taken into account in the Local Plan Inquiries, although for the later ones this Report and possibly the County Council's draft modifications will be available. Following adoption of the Structure Plan, which is expected in the autumn of 2005, it would be "saved" for a

period of up to three years. Well within that period, however, the new South East Plan is also due to be approved, according to the programme outlined by SEERA.

2.34. In terms of the formal development plan system, therefore, the Structure Plan to 2016 appears unlikely to produce a further round of local plan-making before it is itself superseded by the new South East Plan. Nevertheless the District Councils generally welcome the DSP as providing a context for their work on new LDDs, and as noted at paragraph 2.26 above, the County Council sees benefit in avoiding any hiatus in case the South East Plan is delayed. There is clearly a great deal of frustration with the time lags that have built up in the system, whereby on reaching adoption Local Plans have only a few years to run and the Structure Plan has already been superseded. The changes brought in by the Planning and Compulsory Purchase Act 2004 are intended to remedy this kind of situation. It would in our view be extremely regrettable if the birth of the new system in Oxfordshire saw new LDDs which were themselves out of date by adoption or which had to be aborted because the strategic context had moved on.

2.35. Against this background, it would be helpful if the DSP did provide a “bridge” to the new system and the South East Plan. However, as we have indicated above, we do not find the necessary information, background work or certainty about policy directions beyond 2016 to enable it to fulfil this function. Instead, the emphasis should be on the interim nature of this Plan. Efforts should continue to complete with all speed the present round of local planning work pursuant to the adopted Structure Plan and reflecting the further policy thrust of the DSP. We do not consider, however, that this policy framework should start to be cemented into a wave of new LDDs when a new strategic framework is evolving in parallel. Instead the priority should be to gear up to producing new Local Development Frameworks promptly as soon as the context of the South East Plan has been established. By making a fresh start in this way there is some hope that planning delays will become a thing of the past.

2.36. We consider it right that the DSP does not enter into detail about its implementation through Local Plans, and beyond our recommendation at **R 2.4** for clarifying the future role of the Structure Plan, we have no changes to recommend on this matter. We recognise, however, that it is far from simple to organise plan making activity so as to avoid delay, abortive work and constant review and yet provide an up to date policy framework. These are matters that will need to be addressed through the making of new Local Development Schemes in close consultation between the County and District Councils and GOSE. We recommend at **R2.5** that our conclusions above are fed into this process.

2.37. The remaining aspect of implementation to be considered relates to assessing whether what the Plan proposes is achieved. Several participants commented on the complete lack of a formal framework of targets and indicators to facilitate systematic monitoring and review. It is a matter of some surprise that, despite the guidance in paragraphs 2.17 to 2.19 of PPG12 this should have been found unnecessary in the DSP or its predecessors. We have commented in paragraph 2.3 above that the Plan’s objectives, while stating what it is trying to achieve, do not do so in terms which enable the desired outcomes to be assessed. Some clear targets are of course implicit in the DSP text and policies, for example the overall housing provision, and the amounts allocated to Districts and specified locations, the 55% target for homes on

previously developed land, and the 50% affordable housing target. Clearly considerable effort goes into monitoring the basic issue of housing delivery, and the results of this have helped to inform the EIP. The County Council has also sought to review the effectiveness of the strategy, for example with reference to Census data on commuting and balance between jobs and resident workforce.

2.38. For many of the Policies and the objectives to which they relate, there is, however, a lack of clarity about the outcomes sought. Clearly much information is available from elsewhere. Biodiversity Action Plans (BAPs), for example, include their own well developed sets of target and indicators. But BAPs also rely on many activities outside the influence of the Structure Plan for their achievement. It would be useful to seek to identify what difference the Structure Plan is seeking to make under Aim 1 Objective i, and indeed all the other aims and objectives of the Plan.

2.39. The County Council indicated that more attention would be given to monitoring in the work leading up to adoption of the DSP. We do not have detailed or comprehensive proposals for this. Given the short life expectancy of the Plan, and the fact that there will be no successor Structure Plan, it may not be worth devoting a great deal of effort to this task. Nevertheless, improving the DSP as far as practicable will help to set the right approach for the future when LDDs will be subject to much more specific and outcome- oriented monitoring (see PPS12, paragraphs 4.45 to 4.52). Our recommendation **R2.6** reflects these conclusions.

Recommendations

R2.1 Revise Policy G1 as follows -

Replace sub paragraph a) with:

a) deliver the level of development required to meet the objectives of this Plan while protecting and enhancing the environment, character and natural resources of the county.

Replace the final sentence of the Policy with:

In smaller towns and villages development will be of an appropriate scale and type to meet the social and economic needs of local communities.

R2.2 Revise Policy G5 to read as follows:

The countryside will be protected from harmful development. Support will be given to development for agricultural, forestry or outdoor recreational needs or other uses appropriate to a rural area which cannot reasonably be accommodated in a nearby settlement.

The supporting paragraphs should be amended to explain that protecting and maintaining the character of the countryside depends on sustainable rural communities. While most of their development needs should be met within and adjacent to existing settlements, exceptionally consideration will be given to proposals in other locations provided they make a positive contribution to sustainability and do

not have significant adverse effects on established rural activities, countryside quality and the natural environment.

R 2.3 In Policy G3 delete the words “in a phased manner as the development progresses”. Replace with the sentence:

Where appropriate, phasing will be used to co-ordinate development with the provision of infrastructure.

R 2.4 Delete paragraphs 2.18 to 2.24 and replace with new explanatory text referring to the interim nature of this Structure Plan, the emerging South East Plan and Central Oxfordshire strategy, the need for a thorough comparative appraisal of the spatial options for meeting future requirements for development to 2026, and outlining proposals for joint arrangements to ensure that this is effectively taken forward through Local Development Documents.

R 2.5 Our conclusions in paragraphs 2.34 and 2.35 of this Report should be taken into account in the consideration of new Local Development Schemes, in consultation between the County Council, District Councils and the Government Office for the South East.

R 2.6 In preparing the Plan for adoption, the County Council should seek to define the outcomes sought by the Plan, in terms of clear targets and indicators, related to the Aims, Objectives and Policies of the Plan. This monitoring framework should form an input to future reviews of the strategy.

CHAPTER 3: HOUSING – COUNTY WIDE ISSUES

Introduction

3.1. Under Matter 2A of the EIP there were three sub-matters about three sets of issues: the total level of provision for additional housing, the DSP's approach to the proportion of new housing to be achieved on previously developed land, and the provision for affordable housing within the total. The issues are clearly linked to each other, and to the housing distribution issues covered in the following Chapter. The three parts of Matter 2A are dealt with in the sections below.

The County Housing Total

3.2. The DSP proposed 36,500 additional dwellings in Oxfordshire for the period 2001 – 2016, corresponding exactly to the RPG9 requirement of 2430 per annum. This was increased by the pre-EIP changes to 37,300, marginally above the precise RPG9 level but still accepted by most people as generally consistent with it. For the County Council, most of the District Councils and some others this was the start and finish of the argument about the county housing total, with no need to look beyond whether it was in accordance with the RPG.

3.3. A number of developers and others took a different view, however. One argument is that RPG9, at paragraph 8.3 and Policies H1 and H3, anticipates a need for higher housing provision after 2006, suggesting that a regional figure some 10% higher might result following assessments of urban capacity and the scope of the growth areas. There was support for taking account of this by making a pro rata increase in the DSP provision, although RPG9 does not say that this is necessarily how the expected increase would be distributed. A number of participants went further than this, arguing that the RPG9 figures were in any case underestimates and that the Structure Plan should take account of key factors that have emerged since RPG9 was issued. Such factors include: the Government's Sustainable Communities Plan and call for a step change in housing supply, including an additional 200,000 homes over and above what is already provided for in regional guidance, the "Barker" review of housing supply, and work by SEERA towards the new South East Plan, considering regional housing requirements of between 20% and 40% above RPG 9 levels. Further arguments were made that the figures should be increased to take account of the backlog of provision due to the fact that actual housing completions in Oxfordshire have been significantly below the adopted Structure Plan requirement (which is some 2.6% below the RPG9 level).

3.4. On the basis of these arguments, various suggestions were made for higher housing figures, including: 40,150 (University of Reading), 42,550 (Magdalen and Thames Water), 44,500 (Bride Parks) and around 49,000 (Martin Grant Homes). One argument advanced in support of a figure of around 45,000, equivalent to 3,000 per annum, is that this would correspond broadly with the recent rate of change in household numbers in Oxfordshire, which grew by some 30,000 between 1991 and 2001.

3.5. In the debate on this issue, we sought to establish whether the proposed provision would enable the Structure Plan to meet its objective 3(i) "to provide for

sufficient new dwellings of an appropriate size and type for Oxfordshire’s residents, including affordable housing”. We asked whether the County Council had made any assessment of what is required to meet this objective, for example by projecting Oxfordshire’s household increase on a “nil net-migration” or any other basis, or economic analysis of the needs of the county and its people. We were concerned to learn that nothing like this appears to have been done, the RPG 9 figure having been accepted as a surrogate for the county’s requirement. Our attention was drawn to the projection work by SEERA in the context of the Central Oxfordshire study for the South East Plan, which indicated a possible housing requirement for Oxfordshire in the range of 1700 to 3000 additional dwellings per annum. Unfortunately this range is so wide either side of the existing RPG requirement as to be of little help, and in any case we doubt that great weight should be attached to it in the context of the Structure Plan. In the DSP itself, paragraph 7.15 reports that the most recent surveys indicate levels of need for affordable housing (in Oxfordshire) far exceeding total housing supply. This situation was confirmed to the EIP in discussion of Matter 2A.

3.6. We therefore have a situation in which no up to date estimates of the general household requirements of Oxfordshire are available, but the national and regional indications suggest an increase, and local assessments suggest that affordable housing needs alone would, if met, account for all of the proposed provision and more. To this must be added the need for market housing – the requirements of all those people currently growing up in the county and others who will form additional households requiring, and able to pay for, a dwelling in the county over the next 15 years. Obviously, insufficient supply to meet the latter requirement is likely merely to add to affordable housing needs. While there is no quantified assessment of the total housing need, the conclusion is inescapable that the proposed provision is unlikely to come anywhere near to meeting in full the objective of providing sufficient additional dwellings for Oxfordshire’s residents. We suggest at paragraph 3.10 below what to do about this.

3.7. In considering whether to accept the case for an increase in the housing provision, we have been conscious of a number of other considerations. Firstly, our attention was drawn to the statement in paragraph 5.19 of PPG11 that once RPG has been confirmed by the Secretary of State there should be no need to reopen the housing strategy, including annual rates of provision. We do not believe the authors of that guidance intended it to mean that structure planning should proceed without any thought being given to whether or not actual housing needs would be met. The PPG, however, goes on to advise that even where circumstances have changed significantly since RPG was prepared the presumption should be that the RPG housing strategy should be revised before development plans are reviewed. That the Oxfordshire Structure Plan is in fact being revised now only slightly weakens the force of the advice in our view. SEERA is also firmly of the view that the Structure Plan should not depart from the RPG9 requirements by seeking to anticipate the South East Plan. Moreover, GOSE advised in its written submission that to change the Structure Plan figures would require “very significant justification”.

3.8. Adding, say, 10% to the DSP housing provision would, as HBF and others suggested, be unlikely to prejudice the South East Plan assuming that the latter is likely to propose a considerable increase over RPG9 housing levels. However, given the long lead times involved in bringing forward major housing proposals, one must

question what would be achieved in practice by making such a relatively small increase, or indeed a larger one, for the short period until the Structure Plan is superseded by the South East Plan. Whilst it may be seen as paving the way to the new Plan, it could also cause problems and lead to delay.

3.9. The clinching argument, in our view, is the point made by several house-building participants that the first priority for the county is not raising the total housing requirement but increasing the delivery of new housing to meet existing figures. There is a very broad consensus about this among local authorities, developers, and others. CPRE, for example, argued that with RPG9 levels of housing not being delivered, there was no point in calling for more without being able to show how it could be delivered. GOSE also emphasised the priority for ensuring delivery of the existing RPG housing strategy. We recognise the effort now being focussed on delivering new housing in Oxfordshire consistently at the Structure Plan/RPG9 level. Until this is achieved, adding to the total requirement is not likely to deliver anything further and could be a significant distraction from the task. While land and locations have been and are being identified to meet the DSP requirement to 2016, any increase at this stage will give rise to further arguments about where and how the extra should be accommodated, possibly reopening or delaying progress on local plans and proposals going through the system.

3.10. In conclusion, therefore, we see no benefit in increasing the Structure Plan housing requirement beyond 37,300 at this time. Our recommendation **R4.1** in the next Chapter is therefore based on this total provision, as reflected in the pre-EIP changes. Two important consequences flow from this conclusion. One is to emphasise the interim nature of the Structure Plan, which is the subject of our recommendation **R2.4** above. While the Plan “tops up” the housing provision for the period 2001 to 2016, that provision will fall to be revised, most probably upwards, from as early as 2006 onwards by the South East Plan. The second consequence is that the provision in Policy H1 remains inconsistent with the objectives of the Plan as drafted. In order to overcome this we recommend at **R3.1** reformulating Objective i) under Aim 3 to provide a more realistic reflection of what the Plan is actually trying to achieve.

3.11. In the light of our conclusions above, we agree with those who argued that this level of overall housing provision should be regarded as an absolute minimum level to be achieved. We have considered whether this needs to be made explicit in the policy. Clearly in seeking to deliver the provision of 37,300 set out for 2001 to 2016 Oxfordshire will need to achieve the implied annual rate of 2487 dwellings per annum. It will not matter if actual delivery in any year exceeds that rate, indeed for every year since 2001 in which delivery has fallen or continues to fall below that figure, a higher figure will need to be delivered in future years. In at least one case, Vale of White Horse, we were told that new Local Plans include provision to make up the previous shortfall. Variations in annual completions should not therefore be in any sense in conflict with the Structure Plan, since the requirement is expressed as a 15 year total and not an annual rate. Our recommendation **R2.1** to remove the blanket restraint of development from Policy G1 should help to ensure that the housing requirement is not interpreted as a maximum rate.

Previously developed land

3.12. The arguments in part (ii) of Matter 2A concerned whether the Plan was right in looking for 55% of new dwellings to be created on previously developed land (PDL), and whether the approach of having a county wide percentage target in the Structure Plan was the right one. As part of the background to this, the County Council had provided a report of its Housing Potential Study 2003 which showed a potential for 59.9% of the Structure Plan requirement to be met on PDL. GOSE suggested that this argued for a target of at least 60%, in line with regional and national requirements, and referred to published ODPM figures which showed Oxfordshire already delivering 60% on PDL over the period 1999 – 2002. For the EIP the County Council provided a table from an updated housing potential assessment, which showed that the potential on PDL was now 55% of the total and some 2000 dwellings short of what would be required to meet a target of 60%. They also submitted a table of housing completions in the county between 1996 and 2003 showing 50% on PDL.

3.13. Opinions differed about the 55% target and the assessments on which it was based. While accepted by some participants, house builders and others regarded these assessments with suspicion, for example because they were not prepared in consultation with house builders, landowners and others, because the detailed judgements made about the capacity of sites are not transparent and because of other methodological concerns. Another concern is that the assessments were made in the context of finding land to meet a specific requirement, and could change if that requirement was increased, for example by bringing in “new” PDL sites or reviewing assumptions about the capacity of others. Although we were provided with copies of the urban capacity studies, it was beyond the scope of the EIP to test their veracity in detail. Nor do we have information that would enable us to “second guess” the assessments that have been made.

3.14. At the structure plan level, such assessments can in any case only contribute to a broad appreciation of how much housing might be achieved on PDL. Translating this into a target raises a number of difficulties. Firstly, any county target could not be a “standard rate” for all districts but represents an amalgam of what each might achieve – towards 100% in Oxford City and between 40% and 55% in the others. Not surprisingly, while each District had a view on its own target, none could really comment on whether 55% was right for the county as a whole. A further problem is that in the context of a “plan, monitor, manage” approach, too high or low a target, or too rigid an interpretation of a target percentage could have adverse effects on housing delivery. The fact that the county has produced 60% on PDL in previous years does not mean this can be repeated over the whole 15 year period while bringing housing delivery up to the required level. In any event, District Councils are bound to follow the guidance in PPG3 for maximising the achievement of housing on PDL while ensuring that requirements for new housing are met. We see the force of the argument that targets that are both soundly based and challenging can only be determined at district level on the basis of transparent and comprehensive local assessments.

3.15. In the light of all the arguments, we do not doubt that 55% is a reasonable approximation to the proportion of housing that Oxfordshire is likely to produce on

PDL, but consider that 60%, while somewhat more challenging, could possibly be achieved at least in some years. It is also crucial, however, that the focus on PDL does not inhibit the bringing forward of the non-PDL sites that will be required to meet the remaining 40 – 45% of the requirement. Some of the District Councils assured us that this would not occur as, once confirmed in Local Plans, greenfield housing sites would not be held back, for example by the emergence of new windfall sites.

3.16. We conclude that, while the intention of the final paragraph of Policy H1 is positive, a county-wide target of 55% is not the best approach. We agree with those who argue that the Structure Plan should call for the local planning authorities to maximise the amount of housing development on previously developed land in accordance with national and regional guidance. The supporting text in paragraph 7.4, which already refers to the regional target of 60%, should be amended to say that the County Council will monitor performance against the expectation that at least 55% of the county's additional housing will be provided on PDL. Our recommendation **R3.2** reflects these conclusions.

Affordable housing

3.17. Neither PPG12 nor PPG3 gives any express role to Structure Plans in relation to affordable housing. However, there was widespread appreciation amongst EIP participants that this topic continues to be of paramount importance particularly in the South East of England including Oxfordshire, and that the planning system has an important part to play in ensuring the delivery of a range of affordable housing, including both in the social rented and so-called 'intermediate' sectors.

3.18. RPG9 Policy H4 sets out six ways in which development plans should engage in the provision of affordable housing, the emphasis being on a supply based upon local assessments of need and sustainable development criteria. There was also an acknowledgement by participants that the Structure Plan should include policy on affordable housing provision as a means of ensuring a continuity of approach between the broad vision of national policy, the focused objectives of RPG9 and the responsibility of local planning authorities to assess local need based on housing and market needs assessments and to seek to address those needs in local plans and development control decisions. The Panel agrees with that view.

3.19. DSP Policy H4 states that at least 50% of all new housing in Oxfordshire should be affordable, including housing for key workers. We agree with those who maintain that the reference in RPG9 to a provisional indicator of 18,000-19,000 affordable homes a year in the Rest of the South East (ROSE) area should not be taken as a reliable basis for a target in the Oxfordshire Structure Plan against which local plan targets should be set. We are also conscious that a blanket 'asking rate' should not be imposed throughout the County. What is required, and what is deliverable, must be allowed to vary in the light of local assessments. However, we have no objection to an aspirational objective being expressed in the explanatory text to Policy H4. Our recommendations **R3.3** and **R3.4** reflect these conclusions.

3.20. On the basis of all the responses made at the EIP including an indication in several instances of the actual record of District Councils in securing affordable

housing, we do not consider 50% to be an unreasonable figure to set, although it is challenging. It appears however to be supported by most of the Districts, who will be primarily responsible for identifying the level of local need for affordable housing and seeking to secure provision wherever and whenever appropriate.

3.21. We have no illusions that the actual provision that can be made will not match up in most Districts to the actual need, as some Districts have reported that the need identified through local surveys exceeds the overall housing supply in recent years. On the other hand, we are also mindful of the fact that on average only about 18% of the total housing supply has been delivered as affordable housing in Oxfordshire in recent years. Some EIP participants questioned whether a significantly higher proportion could be achieved. The DSP explanatory text at paragraph 7.16 does predicate the 50% target on being able to secure more funding from public sector sources. Another concern expressed at the EIP was the effect that attempts to attain a 50% affordable housing component might have on the supply of general housing, as on the basis of the 18% figure, this would reduce the general market share from the existing 82% to 50%.

3.22. We acknowledge that so far as the City of Oxford is concerned, it may be relatively more difficult to secure a high level of affordable housing provision with the proposed increase in general housing provision having to be met on allocated or windfall sites within the City boundaries, than if the proposed urban extension to the south of the City, with its critical mass of housing provision, were to be retained in the Structure Plan. However set against that is the good record of affordable housing provision actually attained by the City Council. All these circumstances suggest to us that if a 50% countywide objective is sought, then it needs to be applied flexibly in order not only to optimise affordable housing but also to maintain overall market housing delivery.

3.23. We do not agree with the proposition put to us that the only way of securing affordable housing at 50% of the total new housing provision would be to adopt a spatial development strategy that involved the development of a significant area of greenfield land near Oxford and a resultant adjustment of the Green Belt. It would be wrong in our view to allow the strategy to be skewed in this way, given that we are satisfied that the RPG9 housing requirement can be accommodated without resort to such a solution. However we consider that the extent to which ‘critical mass’ could be achieved in the distribution of housing development by the creation of new substantial neighbourhoods with appropriate affordable housing content is a material consideration. Such circumstances may arise when attention is given, as seems to us to be inevitable in due course, to options for growth in and around Oxford and other main settlements within the County.

Recommendations

R3.1 Amend Objective i) under Aim 3 in paragraph 1.26 to read as follows:

i. to provide for sufficient new dwellings to meet the requirements of Regional Planning Guidance, of an appropriate size and type for Oxfordshire’s residents, and to contribute to meeting affordable housing need.

R3.2 Amend the final paragraph of Policy H1 to read as follows:

Local planning authorities should seek to maximise the proportion of new dwellings built on previously developed land in accordance with national and regional guidance, while maintaining total housing delivery at the levels required to fulfil the provision set out above. Where appropriate phasing will be used and the release of large sites managed so that priority is given to the development of previously developed land and buildings within urban areas, and land is released gradually throughout the plan period, and to ensure the provision of necessary supporting infrastructure, services and facilities and other improvements.

Amend the penultimate sentence of paragraph 7.4 to say that the County Council will monitor performance against the expectation that at least 55% of the county’s new housing will be provided on previously developed land.

R3.3 Amend the first sentence of Policy H4 to read:

Provision shall be made in local plans or development frameworks and through the determination of applications for planning permission, for affordable housing including housing for key workers, at a level commensurate with the identified need for such housing in each District.

R3.4 Amend the first sentence of paragraph 7.16 of the explanatory text to reflect the removal of the 50% target from the Policy, indicating that the delivery of affordable housing will be monitored against the expectation that 50% of the additional housing provided in Oxfordshire should be affordable, including homes for key workers.

CHAPTER 4: DISTRIBUTION OF HOUSING

Development within Oxford

4.1. In this section we consider the issues that were discussed under part (a) of Matter 2B of the EIP. Although a key issue in relation to Oxford is the proposal for an urban extension in the Green Belt south of the City, and its proposed deletion from the DSP, since that proposal would be located outside the City it falls to be considered in the next section on Central Oxfordshire. In this section the focus is on development within the City boundaries, where the debate revolved around the assessed urban capacity, and the prospects for achieving the level of development envisaged in the DSP, as proposed to be amended.

4.2. Many of the issues had recently been considered in detail at the Public Inquiry into the Oxford Local Plan 2001-2016, the Inspector's report on which was still awaited at the time of the EIP. Since the time horizon for the Local Plan is the same as that of the DSP, and since the Urban Capacity Study Update was at the centre of the arguments about development within Oxford, there is inevitably some overlap between the Structure and Local Plans. It is not our purpose to go over the issues again in detail but to consider, at an appropriately strategic level, whether the Structure Plan proposals for Oxford are soundly based, sustainable and deliverable.

4.3. The DSP proposed 5500 additional dwellings within Oxford over the 15 years to 2016, compared with the existing adopted Structure Plan provision of 3750 over the 15 years to 2011. In the pre-EIP changes the provision was further increased to 6500. The County Council considered that sufficient capacity for this was likely to come forward, pointing to the fact that capacity had originally been assessed at 3,800 (when the Structure Plan requirement was 3750), revised to 5,500 in the Housing Potential Study which informed the DSP, and most recently re-assessed at over 6000. It was argued that further capacity was likely to be identified, noting that large windfalls had been conservatively assessed at only 20 dwellings per annum, and that potential sources such as the West End project had not been included in the estimates. A number of participants also argued that further capacity exists within the City in the form of Areas of Safeguarded Land (ASLs), which should be considered for development before options which involved development in the Green Belt.

4.4. In support of the proposed provision of 6500, the County Council and other participants pointed out that, in the light of the priorities for concentrating development in urban areas it was important for the Structure Plan to set a realistically high target. Oxford City had in the past consistently out-performed the assumed rate of housing growth. The adopted Structure Plan provision of 3750 had been achieved within the first 5 years and completions continued to run at a higher level. Discounting the fact that completion of the Greater Leys development on greenfield land had resulted in disproportionately high completions in some years, the County Council argued that completions in recent years were about 415 dwellings per annum, suggesting that the proposed provision of 6500, which equates to 433 per annum, was achievable.

4.5. Oxford City Council confirmed that the capacity of the City had been most recently assessed at 6053 additional dwellings for the period 2001 – 2016, and that

completions were currently running “in the 400s” per annum. The Council argued, however, that the capacity now identified was the maximum that could be achieved on previously developed land (PDL) and that the additional 500 dwellings required to meet the proposed provision of 6500 could not reasonably be provided within Oxford. In considering future urban capacity, account needed to be taken of what was already being done. On density, for example, Oxford is already achieving the highest average housing densities outside London, at about 60 dwellings per hectare (dph) in recent years. Whilst further increases in density may provide additional capacity in other towns, at Oxford this would not be practicable without compromising urban design quality and the urban environment. In this context some participants drew attention to the priority placed by Policy EN5 on Oxford’s architectural and historic heritage, including its green spaces and landscape setting, arguing that this set limits to the extra capacity that could be wrung out of the City through more intense development.

4.6. With regard to the ASLs, the City Council argued that these were subject to constraints such as floodplain or comprised important areas of open space. In some cases the ASLs were considered unsuitable for housing, although they might accommodate other uses relocated from other urban sites which could provide some housing. The Council also argued against expecting further housing gains from the redevelopment of employment sites, claiming that much of the housing already provided on brownfield sites had come from such sources, but that this had a negative economic impact in Oxford, particularly on opportunities for small firms and new enterprises.

4.7. We take the view that it is entirely consistent with national and regional guidance, and with the sustainability objectives of the Structure Plan, that the housing distribution should seek to maximise the additional housing achieved within Oxford. There also seems to be no dispute that the City has capacity to provide some 6000 additional dwellings up to 2016. The point at issue is whether it is reasonable to expect still more by including a figure of 6500 in Policy H1. From the evidence it is clear that Oxford’s performance in recent years has been exemplary in securing the delivery of housing above the adopted Structure Plan provision, in developing at densities of around 60 dph and in achieving over 90% of new housing on PDL. We also recognise that the special characteristics of Oxford will limit the extent of further urban intensification that can be reasonably expected. Nevertheless, there are other factors to be considered.

4.8. We accept that the City Council’s latest assessments of capacity have been thorough and have included all the sources of potential the Council thought appropriate, while exercising due caution. It is clear, however, that such assessments change over time, and in that sense can never be final. In relation to the housing capacity study update, some participants drew attention to the 15% discount made to allow for the possibility that potential will not in the event be realised. While this is consistent with the general guidance in the Government’s document “Tapping the Potential”, it is an assumption that will stand to be reviewed as each potential site comes through the system. We also note the argument put forward by the County Council and others that the potential housing increase from the West End project and certain other large sites had not been included.

4.9. In relation to ASLs, we appreciate that the City Council has not counted them as part of the potential because of its views about the problems with developing them. However, as indicated in PPG2, such areas are intended to serve development needs in the longer term and should be genuinely capable of development when needed. It is not for the EIP to assess the ASLs specifically, but on the basis that they were identified some years ago to meet possible long term development needs (and in order to avoid the need to alter Green Belt boundaries), it is logical that their potential should in due course come into play as an option for meeting Structure Plan requirements. If it is really the case that they cannot reasonably be developed for housing, or for other uses which could provide housing gains elsewhere through a “displacement” effect, then their ASL designation should be reviewed. Finally on employment land, we appreciate the City Council’s concerns about the economic needs of the City. This issue is discussed further in Chapter 5 below. In relation to housing, however, we do not consider the need to ensure a continuing supply of sites and premises for employment should necessarily rule out further housing gains from this source. It would appear probable that in redevelopment situations, whether in town centre or other locations, an element of housing will often play a role in future, and could actually contribute to the viability of schemes providing employment floorspace. This is a dynamic process, and it is not a criticism of the urban capacity study to say that it may not have covered all such potential.

4.10. In the light of the above considerations, we conclude that there is the prospect that, over the Plan period, sufficient additional potential can come forward to realise the proposed provision of 6500 additional dwellings in Oxford. This is less than 500 above the capacity already identified – equivalent to some 33 extra dwellings per annum. Clearly more of the capacity is likely to come forward in some years than others, with the more uncertain elements arriving later in the Plan period. If in the event the expected potential is not being realised, a Plan Monitor Manage approach will reveal this and plans may need to be reviewed. In the light of our conclusions, our recommendation **R4.1** includes the figure of 6500 for Oxford City.

4.11. In reaching the above conclusion, we would emphasise the point made by the City Council and others that there must ultimately be an upper limit, and the urban area cannot be expected to go on yielding increasing amounts of housing indefinitely. This underlines our conclusion in Chapter 2 about the essentially interim nature of the Structure Plan. For meeting Oxford’s housing needs beyond 2016, or if the housing requirements for the county up to 2016 are increased in the South East Plan, we believe it inevitable that solutions beyond the present boundary of the urban area will need to be considered.

Central Oxfordshire

4.12. The EIP session on Central Oxfordshire was presented with two lines of argument which might be regarded as irreconcilable. These are firstly, the proposition that as Oxford is the most sustainable settlement in the County, much of the growth in development in future years should be centred in and around the City and should have a close spatial association with the City. The second proposition is that there should be no incursion into the Green Belt that surrounds Oxford, to uphold the purposes of

the Green Belt as set out in PPG2 and in particular, to preserve the City's historic character and landscape setting.

4.13. The first part of the session was taken up by discussion about the merits of an urban extension on **land to the south of Grenoble Road** on the southern outskirts of Oxford, and its effect (and the effect of other proposals) on the Oxford Green Belt. The urban extension to accommodate about 1,000 dwellings was included in DSP Policy H1 but proposed for deletion in the pre-EIP changes. The deletion had the support of two District Councils, developers who were advocating different spatial solutions to development growth associated with Oxford, the CPRE, parish councils and other local interests directly affected. Some support for the urban extension remained, not surprisingly from those who were promoting it and with varying degrees of conviction, from the other three Districts, including Oxford City Council. The City Council however, expressed its support for a larger urban extension than had been proposed, amounting to some 2,500 dwellings as part of an eventual development of 4,000-5,000 dwellings.

4.14. We conclude earlier in this report that, within the limited horizons of the Structure Plan, we agree with the County Council's view that there are no exceptional circumstances justifying the release of land in the Oxfordshire Green Belt for housing up to 2016. Our view that there should be no increase in the Structure Plan housing provision above that proposed in the pre-EIP changes is a decisive factor. We have also expressed satisfaction that there should be sufficient capacity within Oxford City to accommodate the extra 1,000 dwellings allocated to it in the pre-EIP changes by 2016, in what is effectively a quid pro quo for the urban extension.

4.15. Our conclusion about the housing provision means that the two issues referred to in paragraph 4.12 above need not face each other head-on for the moment; however the issues may well return should significant growth be proposed through the South East Plan. We doubt if the latent potential of Oxford to further develop its economic activities in the light of its world-wide reputation can be achieved without a degree of change in Central Oxfordshire. It follows that an urban extension to Oxford might have to be considered in the assessment of growth options for Oxfordshire.

4.16. We accept that such an assessment would include judgements about the Green Belt and the capacity for growth outside the Green Belt, in existing or new settlements. Furthermore, our agreement that the proposed urban extension on land to the south of Grenoble Road should be deleted from the Structure Plan should not be taken as an indication that such a proposal is without any merit. The consideration of urban extensions follows directly on from the use of previously-developed land in the urban area in the sequential approach to new housing development set out in PPG3.

4.17. In the light of our conclusions about the general need for an urban extension and in relation to the Green Belt we feel that there is no need for us to carry out a detailed assessment of the merits of the urban extension, even were there justification for doing so in the context of the Structure Plan. However we note that arguments of physical contiguity, transport sustainability, building communities, the scope to provide a range of general and affordable housing, lack of harmful impact on the landscape setting of the City and scope for economic growth (by an extension to the Oxford Science Park) were claimed as merits. On the detriment side were the cost of

or difficulties in mitigating or relocating utility infrastructure, encroachment into Green Belt countryside, effect on agriculture and harm to local village character and communities. These and other factors might remain at issue if Grenoble Road, or a proposal for a different urban extension, fell to be considered in the context of proposals for further growth in the Central Oxfordshire Sub-region in the South East Plan.

4.18. One factor in favour of an urban extension to Oxford (or significant growth elsewhere around Oxford) might apply even if no overall increase in the Structure Plan housing provision were proposed, that is, if there were reason to redistribute some of the proposed housing provision away from the country towns of Bicester, Banbury, Witney or Didcot, reduce or delete the strategic housing allocation at Grove or reduce the residual allocation to the rural areas. We reach conclusions on these matters later in this Chapter. Notwithstanding certain drawbacks in the country towns and Grove relating mainly to infrastructure deficit, we do not see a compelling case for a redistribution that would bring the Oxford urban extension back into the reckoning in the Structure Plan. We are also recommending that the rural housing allocation be maintained at its proposed level, to offer scope for development to satisfy the housing, local employment and social development needs of rural communities, to support the rural sustainable development agenda.

4.19. Our conclusions about the urban extension on land south of Grenoble Road also apply in large measure to alternative strategic development locations proposed by EIP participants elsewhere around Oxford, most of which are in the Green Belt. The proposal for an urban extension on the **southern or south-eastern outskirts of Oxford** raises some issues in common with the land south of Grenoble Road. If consideration were being given to the location of greenfield urban extensions adjoining Oxford in accordance with the sequential approach to new housing development in PPG3, then the merits of this proposal could be considered in relation to other possible urban extensions.

4.20. Other proposals, such as those relating to land at **Kennington Road, Radley**, near **Sunningwell** and at **Botley** raise issues about the potential for the increased use of the A34(T) with resultant implications for peak hour congestion on that road. We conclude later in this report that the A34 serves a local function that should at least be acknowledged, despite its designation as an International and Inter-Regional Corridor. It is likely that development in the locations mentioned would tend to encourage an increase in car traffic on the A34. We note however that routes are available into Oxford from Kennington and from Botley that do not involve the A34. The **Radley** proposal also seeks to make use of frequent bus services between Abingdon and Oxford and bus links to Didcot, and refers to the proximity of Radley rail station with its frequent services to Oxford and Didcot. The proposal is presented as an opportunity to secure 50% affordable housing without recourse to grant subsidy.

4.21. The location near **Sunningwell** promoted as an 'ecovillage', was stated by the promoters as able to accommodate about 2,000 dwellings, possibly rising eventually to 6,000 dwellings. The project, which is strongly opposed by a local residents' group and the Parish Council, is also envisaged as delivering a large number of affordable dwellings in association with a registered social landlord development partner. Amongst the other benefits it is argued would accrue from this location are proximity

to the employment centres of Oxford and Abingdon, the ability to create attractive residential environments and mixed development, the provision of a remote park and ride site, improvements to the nearest A34 interchange, connections to high quality bus routes on the A34 and the promotion of innovative ecological techniques.

4.22. We note that the **Botley** land is safeguarded land, not in the Green Belt. We consider that whatever its merits for housing development, it would be unlikely to realise development of such a scale as to warrant a reference in the Structure Plan as a strategic development location. The suitability of the land for housing development should be determined through the local plan process or the consideration of an application for planning permission.

4.23. We accept that substantial development proposals to the south or west of Oxford requiring adjustments to the Green Belt could realise benefits of deliverable general market and affordable housing, and that to a greater or lesser degree, they would be accessible to regular bus or train services. However, they could also result in increased traffic flows on the A34 or local roads. We also find it difficult to make a judgement on their individual impact on the Oxford Green Belt, and suggest that if considered further in the context of growth proposals associated with the Central Oxfordshire sub-region, then such an assessment should be undertaken hand-in-hand with a comprehensive review of the Green Belt. However, our conclusions about the size of the Structure Plan housing provision and distribution of development to the country towns, Grove and elsewhere do not suggest a compelling case to identify in the Structure Plan strategic development locations requiring adjustments to the Green Belt to the south and west of Oxford at the present time.

4.24. Reference was also made to the suitability of **Berinsfield** to accommodate further housing development. However, we are not convinced about the ability of a substantial housing proposal to promote sustainable development in what appears a relatively unsustainable location. Even were there a case for further housing development at Berinsfield, we do not see that justifying development on such a scale as to merit reference in the Structure Plan as a strategic development location, or to justify an adjustment to the general extent of the Green Belt outside a general review. A modest increase in housing in Berinsfield to allow for a better range of housing as referred to in paragraph 2.16 of the explanatory text would be a matter for the local plan or local development framework, as would any consequential adjustment to the Green Belt boundary.

4.25. Locations for development near Kidlington were also commended to us. Housing development and mixed development incorporating the employment development on the 'cluster' principle on **land to the north and west of Kidlington** was amongst the possible developments suggested, including reference to development associated with Oxford Airport. There was also advocacy of development to support an enlarged community at **Begbroke, Kidlington and Yarnton**. We accept that the principle of further development in the general vicinity of Kidlington is not without some merit based upon proximity to the City of Oxford, the potential for transport improvements in the area and the advantages to general aviation and business of employment development near Oxford Airport.

4.26. However, we see no justification for reference in the Structure Plan to any such potential near Kidlington in the form of a strategic development location, bearing in mind our overall conclusions about the quantum and general distribution of the Structure Plan housing requirement, and consequently no justification for the adjustment of the Green Belt to accommodate such a proposal. Any question of the removal of a small pocket of Green Belt land on the grounds that it no longer serves any of the purposes of the Green Belt should be resolved, in the absence of or prior to a general Green Belt review, through the local plan/local development framework process. Alternatively the principle of development on such land which is in policy terms inappropriate can be dealt with by consideration by the local planning authority of planning applications submitted on the basis of ‘very special circumstances’.

4.27. We accept that a mixed employment and housing proposal to the north of Kidlington, at **Shipton-on-Cherwell Quarry** is different from most other development locations mentioned at the EIP, because it would use previously-developed land (PDL) as defined by PPG3. Emphasis was placed by those promoting this development location on the merits of a new rail station, and we discuss this in Chapter 6 of this report. We also note that by the nature of the site in question, the visual impact of the development on the surrounding countryside would be less than it would be if this were a conventional site.

4.28. If consideration were being given to the merits of a number of development locations around Oxford, then having regard to PPG3 consideration should be given to the development of PDL before greenfield land, unless the PDL performed so poorly in relation to the criteria listed in the PPG as to preclude its use for housing. We consider it unlikely that the Shipton Quarry location would fall into the ‘poorly performing’ category. Yet we do not consider that this warrants a reference to this land as a strategic development location, given our overall conclusions about the Structure Plan’s level of housing provision, the capacity of Oxford City and the housing allocated to the country towns and elsewhere.

Bicester

4.29. Policy H1 as represented in the pre-EIP changes proposes Bicester as a main location for new housing, accommodating about 3,300 new dwellings in the period up to 2016. This is an increase of 100 dwellings over the DSP figure. The County Council regards the revised figure as representing consolidation of the role of Bicester as a country town, a measure of restraint being applied to continued housing growth due to what has been referred to as infrastructure deficit. There appears to be no comparable restraint upon employment development, as further development to strengthen and diversify the town’s economy would help to produce a better employment-housing balance there.

4.30. We heard that an adverse effect of growth in Bicester in recent years has been a high level of out-commuting, particularly to Oxford. This despite a rail service between Bicester Town and Oxford has led to peak hour road traffic congestion on the A41/A34(T), including at the roundabout at Junction 9 on the M40. Bicester’s role as a dormitory town has been encouraged not only by a relative shortage of high skill jobs in the town, but also by good rail and motorway connections to London.

4.31. The shortfalls in infrastructure in or associated with Bicester were documented in Annex 5 to the 19 October 2004 officer report to the County Council Executive prior to the Council's consultation response to SEERA on the Central Oxfordshire Sub-regional Strategy. The shortfalls include roundabout improvements at Junction 9, the provision of an enhanced public transport link to Oxford, local transport improvements, leisure facilities including a town centre cinema and new library, a possible new secondary school, improved health facilities, and measures to stimulate local employment and affordable housing to address local needs.

4.32. Some at the EIP maintained that the only realistic approach to ensuring that much of this infrastructure could be delivered was to plan for sustained growth in the town at such a scale as could secure essential infrastructure through planning obligations and partnerships. This was set against a background of historical under delivery of housing provision in Cherwell District, a difficulty the District Council and GOSE are working together to address. The District Council was not confident that the 'sustained growth' approach would secure sufficient infrastructure of the type required, and favoured modest growth in the town with no suggestion of any acceleration after 2016. We note from Thames Water Utilities that significant growth would require upgrades in water supply and sewage treatment infrastructure provision. However there are relatively few other environmental constraints to growth in and around the town.

4.33. Apart from these technical considerations, we see the future justification for major growth at Bicester as dependent upon what spatial solutions are identified to accommodate growth in Central Oxfordshire beyond 2016. We acknowledge the town's locational advantages in relation to London, Birmingham, Oxford and Milton Keynes although in terms of the last two mentioned cities, that would be dependent for full realisation upon a marked improvement in sustainable transport choices. We also accept the greater potential for the delivery of a range of infrastructure works that comes from significant growth. However, on the basis of our acceptance of the quantum of the overall Structure Plan housing provision as proposed in the pre-EIP changes, we find no strong justification to increase the housing provision for Bicester beyond what is now proposed in those changes. An important part of the responsibility of providing the right conditions in the town for the provision of infrastructure and the encouragement of suitable employment development falls to the local plan/local development framework process. We view with some concern reports of the slow progress of the local planning process conveyed to us at the EIP.

Banbury

4.34. The DSP proposes new housing provision of 3,700 dwellings at Banbury, there being no change to that figure in the pre-EIP changes. Although the town has the status of a country town and has grown steadily in both housing and employment terms in recent years, some of the employment development has been low labour intensity, distribution uses finding locations near the M40 motorway attractive. However the town centre has also grown and diversified and appears to serve both the town and its rural hinterland well. There is otherwise a good employment base and employment/housing balance, the town being relatively more self-sufficient than Bicester and more remote from commuter patterns associated with Oxford.

4.35. However, Banbury does have a number of technical constraints that are argued by the County and District Councils as justifying limitations to its future growth, although proximity to the M40 is not regarded by the Highways Agency as likely to result in unacceptable traffic conditions, if growth did take place. The constraints include flood risk, landscape setting and highway capacity which the District Council argues put a severe constraint on the release of greenfield land. It is also maintained that opportunities for improving local transport infrastructure are limited. Above all, it is confirmed by the District Council that the Structure Plan housing allocation can be satisfied by the use of PDL within the urban area.

4.36. In these circumstances, we do not favour any increase in the Structure Plan housing provision for Banbury. Our view is also influenced by the lack of any strong need to redistribute housing development to Banbury from Bicester or other settlements. It follows that we are satisfied that there is no justification for the identification in the Structure Plan of any urban extension or other strategic development location associated with the town. Nor do we find the argument that it is necessary to identify one or more urban extensions in the Structure Plan in order to redress uncertainty in the local planning process to be a convincing one.

4.37. We do not feel obliged to consider whether in different circumstances the factors argued as limiting the further growth of Banbury are such as to preclude consideration of any urban extension. However the merits of such a proposition might need to be tested if Oxfordshire was called upon to accommodate significant further housing growth in the South East Plan.

Upper Heyford

4.38. DSP Policy H2 proposes a new settlement of a maximum of about 1,000 dwellings (including existing vacant dwellings) at the former RAF/USAF base at Upper Heyford. It continues and develops Policy H2 of the adopted Structure Plan. The development of this substantial site which is in large part PDL in status relies upon a planning brief approved by Cherwell District Council. The main purpose of the proposed development is stated in the Policy to be as an enabling provision to deliver landscaping and other environmental improvements.

4.39. We note that it had been suggested at some stage in the consideration of Policy H2 that an assessment should be made of the merits of accommodating a much larger settlement at Upper Heyford than that proposed in Policy H2. We accept that a larger settlement could in terms of 'critical mass' enable a mix of housing and employment development to be provided at the airfield site that would give the settlement a degree of self-sufficiency. However we cannot see that this would be achieved on such a scale as to preclude a large number of car-borne journeys to work, both by people living in Upper Heyford and working elsewhere and by those commuting in to Upper Heyford to work. The prospects that such a larger settlement might raise of good bus services, improved train services through Heyford rail station or even the establishment of a new park and ride rail station at Ardley are not in our view sufficiently convincing, on the evidence before us, to dispel the view we have reached that such a settlement would be less sustainable than other options for accommodating the overall level of growth proposed in the DSP.

4.40. A brief for the Upper Heyford site was prepared by Cherwell District Council in 1999 but in 2000 an outline application was submitted by North Oxfordshire Consortium Ltd (NOCL) for 1,000 new dwellings together with the re-use of existing buildings and structures to accommodate about 1,500 jobs. A public inquiry took place in June/July 2002 into NOCL's appeal against the Council's non-determination of the planning application. The subsequent decision by the First Secretary of State was to dismiss the appeal and to emphasise that the provisions of Policy H2 of the adopted Structure Plan 'should be regarded as an exception to normal sustainability objectives as a means of facilitating the remediation of the former airbase to enable the site to present a more environmentally acceptable face than it does now'.

4.41. The County Council considers that Policy H2 is still a necessary provision of the Structure Plan, a view supported by Cherwell District Council which sees the Policy as an essential component of the development plan at a time when there is no relevant adopted local plan policy. We agree with those positions, even though GOSE maintained that the development proposed in the Policy was not of a sufficient scale or significance to justify the presence of the Policy in the Structure Plan. In our view the circumstances at Upper Heyford, if not unique, are sufficiently unusual to justify a Structure Plan policy. Whilst we accept that there are many disused or redundant airfields up and down the country, it seems to us that the size and extensive infrastructure of the Upper Heyford site, its use by both the RAF and the USAF and in particular, its associations with Cold War military operations are factors that set the site apart from most airfields.

4.42. NOCL sought some adjustments to Policy H2. Of these, the County Council conceded that the reference to 'a maximum' of about 1,000 dwellings was probably unnecessary. We consider that 'about 1,000 dwellings' would serve the purpose of establishing the appropriate size for the development. NOCL also requested that the reference to 'including existing dwellings' should be deleted. We agree, as we have no evidence to support the retention of any or all of the existing dwellings in all circumstances. The removal of those words would allow flexibility for the developer to retain the dwellings or remove them all, or to demolish some and retain some. In each option, the total limit of about 1,000 dwellings would be the determining factor.

4.43. The other suggestion made by NOCL, that part (b) of the Policy be replaced by a new part based upon parts (b) and (c) of the adopted Policy, leads towards the other major issue associated with the Upper Heyford site, namely its Cold War heritage interest. This is a matter that was acknowledged when the DSP was drafted, as there is reference to it in paragraph 7.7 of the explanatory text. However it appears to have increased in profile since the public inquiry, and was represented by the presence at the EIP of the Oxford Trust for Contemporary History (OTCH). OTCH's main point was that the Cold War heritage legacy at Upper Heyford was a matter of national if not international significance. The Trust's position appeared to be that whilst having no fundamental objection to the principle of some enabling development at Upper Heyford, it suspected that Policy H2 might be capable of being used as a means of securing the dismantling of the air base.

4.44. For its part, NOCL confirmed a willingness to work with English Heritage to devise a mutually acceptable basis for developing the site. Reference was made to the

map of the site prepared by English Heritage which shows buildings recommended for retention or Listing, structures or areas recommended for scheduling and an area identified for the preparation of a conservation management plan. This suggests an approach that could be somewhat different to that implied by Inset Map No. 51 prepared by Cherwell District Council. It also suggests a need for Cherwell District Council to review its planning brief for the site in consultation with English Heritage and the site owners and developers. Our recommendations at **R4.2** and **R4.3** suggest policy text appropriate to these circumstances and to deal the amendments to part (a) of the Policy, and to the supporting text.

4.45. OTCH's support for the proposed housing and employment allocation in Policy H2 is conditional firstly on feasibility studies being prepared to explore the historic value and potential of the Cold War base, and secondly on the basis that new development should be permitted only in order to enable this potential to be realised. The Panel takes a slightly different approach. We consider that the question of feasibility studies should be embodied in a process of dialogue and consultation that the District Council would engage in with English Heritage, the site owners and other interested parties in the preparation of a revised brief. Agreement should be reached as to the timescale of this process, so that the way forward is clear.

4.46. For the purposes of the Structure Plan it is difficult to make a judgement as to what scale of development is 'necessary' to enable the heritage potential to be realised. We also consider that there are objectives to be achieved apart from securing and managing the site's heritage value, namely achieving environmental stability and upholding sustainable development principles. We therefore support the level of development proposed in the Policy, which no party to this matter has seriously disputed.

Didcot

4.47. Didcot has long featured in the country towns strategy, and the DSP proposes to continue that role, although the actual quantity of development proposed – 4500 additional dwellings between 2001 and 2016 is less than the adopted Structure Plan allocation of 5500 between 1996 and 2011. The County Council explained that the DSP allocation allows for the development proposed in the adopted Structure Plan to be completed, together with additional housing potential that has been identified within the urban area. Didcot is, however, also being considered for further growth beyond 2016, as indicated in the explanatory text of the DSP and in the Council's contribution to the SEERA Central Oxfordshire study.

4.48. We are mindful of the history of provision for growth at Didcot, which straddles the boundary between South Oxfordshire and Vale of White Horse Districts, and the delay that has occurred in delivering the planned provision. That has been and is being addressed, through a Structure Plan alteration to determine the allocation between the two Districts, and in Local Plans which will be the subject of a joint public inquiry starting in November 2004. A central issue has been the choice between locations for development to the west and the north-east of the town, which was decided in favour of development mainly to the west when the Structure Plan alteration was adopted on 2001. The issues were hotly disputed and the choice was,

in some respects, finely balanced. We accept the view of the County Council, which was also shared by many participants including some who did not agree with the location chosen, that it is not necessary to re-visit the allocation between districts or alternative development locations. The priority now, as GOSE and many others stressed, is to get on with delivering the development already planned. We have therefore sought not to reopen the matters previously determined through the Structure Plan, or to trespass on those which will be the subject of the joint local plan inquiry.

4.49. A number of key issues that were discussed at the EIP remain to be considered here. These were concerns about the traffic and transport implications of growth, whether the additional provision the DSP proposes between 2001 and 2016 is too much or too little and issues about the longer term growth role of Didcot. On the traffic and transport issues, we note that these have been one of the factors contributing to past planning delay. Despite the aspiration in the light of guidance in PPG13 and elsewhere to reduce the need to travel by co-locating homes and jobs, the main reason that Didcot has been favoured as a growth location is its accessibility to economic centres elsewhere – London, Reading and, within the County, Oxford and concentrations of employment closer at hand at Culham, Harwell and Milton Park. We do not see this situation changing given Didcot's proximity to major employment centres in southern Oxfordshire, relatively unconstrained land supply and good communications. This is not to say that Didcot does not have its own employment potential or that this should not be exploited but it does mean that growth needs to address movement not only within the town but also to other centres.

4.50. We appreciate the concerns of the Town Council, the Campaign for a Sustainable Didcot and other local organisations and individuals about traffic problems and congestion and the highway improvements need to deal with them. As elsewhere the A34 is a focus of many of the problems. For east-west movement, we note the emphasis now being given by the County Council and the Vale of White Horse District Council to the linking of the A4130 and A417 to bring relief to the Milton Interchange and provide direct access to Milton Park. North-south movement on the A34 is more intractable. The Highways Agency indicated that there is no prospect of major widening of the road itself, so local improvements and management solutions must be relied upon to improve the flow. The inevitable conclusion, however, is that changes in travel behaviour and greater public transport use are not only desirable from the point of view of sustainability, but essential in the context of growth at Didcot.

4.51. We found considerable scepticism locally about whether the desired change in travel habits can be brought about. No doubt experience of past and present bus services contributes to this view. While Didcot is well connected by rail to Oxford, as well as more distant locations, this does little to serve the many more local origins and destinations. Rail use is also seen as the cause of other problems as commuters access Didcot Parkway station by car if the bus is not convenient. For more local circulation more traffic problems are foreseen as the town grows, with new residential areas too far from the town centre for easy access on foot. These are, we recognise, difficult issues. Nevertheless, securing more sustainable travel is in our view the only possible way forward. We are aware of the effort going into this, for example through negotiation with developers on contributions to infrastructure provision, putting in

place travel plans, and in the priorities for local transport investment. Within the Structure Plan, our conclusions and recommendations in Chapter 6 seek to strengthen the transport policies, and focus priorities *inter alia* on movements between Didcot and Oxford and other key employment centres. At the implementation level, as one developer participant put it, public policy no longer tolerates development without providing the infrastructure necessary to support it. This is also reflected in the Structure Plan at Policy G3.

4.52. On the level of growth up to 2016, several developers argued that, instead of the reduced rate of provision in the DSP compared with the adopted Structure Plan after 2011, the rate should be maintained or increased. This view was allied to calls for a higher county total provision, and to arguments that more development would be needed to support economic growth in the south of the county. One argument was that there was scope for more development to the west of Didcot, close to Milton Park. It was also argued that, while the choice had been made in favour of growth to the west, further development to the north east of the town had been shown to be both acceptable and deliverable, and that raising the provision for Didcot would allow more flexible implementation. Against this the County Council argued that, to fulfil the Structure Plan, building rates would have to rise from the current average of around 215 dwellings per annum to over 600, and that it was doubtful that that such high building rates could continue through to 2016. The District Councils and some participants agreed but Didcot Town Council and a number of others felt that the town would need a respite from high levels of growth after 2011, and that even the DSP provision was too high. One view was that additional urban capacity that had been identified, such as that at Vauxhall Barracks, should be used to reduce the amount of greenfield development required, rather than be added to the total. We also note concerns about social integration, although we would see that as an issue for implementing and managing change, rather than a determinant of the level of growth to be provided.

4.53. We are in no doubt that the DSP total provision can be satisfactorily delivered, provided the transport issues are properly tackled. We are also satisfied that this provision is necessary in the light of our conclusion in Chapter 3 about the county housing total and the inevitability that demand will remain strong in the south of the county. It would be unrealistic in our view to expect that growth at Didcot should stop entirely after 2011. As for whether a higher level of growth should be sought, we recognise that the opportunity to the north east of the town remains. We appreciate that some of those who have reservations about the total amount of growth proposed find it hard to argue against development in that location, having previously supported it in preference to development to the west. Nevertheless, we take the view that it would be undesirable to lose the focus on delivering the growth currently planned by increasing the total and reopening consideration of development locations at this stage. Our recommendation **R4.1** therefore endorses the DSP proposed provision for Didcot as incorporated in the proposed pre-EIP changes.

4.54. The above conclusion must be seen in the context of our overall view about the interim nature of the DSP and the issues that must be considered in taking the county's development forward under the new South East Plan. Didcot will remain a logical place to look for new development in the south of the county and, as noted above, the County Council has this in mind. In our view further growth at Didcot is

quite likely to be part of the strategy to 2026, although what part it will play, and whether this will entail increasing the provision above the DSP rate after 2011 are not matters to be determined here.

Grove

4.55. The DSP proposes Grove as a main location for new housing, to accommodate about 2,100 dwellings, as part of the housing provision for the Vale of White Horse District. No change to that provision was proposed in the pre-EIP changes. There is support for the proposal from the District Council (VOWHDC) and some other Districts, from several developers, from major employers in southern Oxfordshire including those based at Harwell and Milton Park and from those who consider that such development would support the case for the re-opening of the Grove rail station. A few developers/landowners regard Grove as an unsustainable development location. Concern has been expressed by local representatives about certain aspects or implications of the development; there are other locally based representations on specific environmental matters such as flood risk.

4.56. Considerable housing development has taken place at Grove in recent years, although the village still has a separate physical identity from its neighbouring settlement of Wantage. The Vale of White Horse Local Plan proposes major housing development at Grove for the period up to 2011. The proposed Local Plan allocation site is the former airfield to the west of the village, a location supported by development interests. Other parties favouring development at Grove identify land to the north of the settlement. There is a widespread recognition that recent development has run in advance of local infrastructure, principally local distributor routes and transport, social and community provision. The development projected in the local plan and DSP is likely to require an enlargement of local secondary school provision. There is some scope for an expansion of local employment, at the Grove Technology Park.

4.57. Those who oppose the DSP housing provision for Grove mainly argue that the location is unsustainable. In our view however, the principal factor in favour of the proposed housing allocation is that it would help to serve the needs of the expanding employment base in southern Oxfordshire including major sites at the Harwell complex, Milton Park and Didcot, and help to maintain a housing/employment balance in the face of the continuing rise in employment levels predicted to occur in the next few years. However, we consider that the relatively poor public transport infrastructure in the area is a significant encumbrance to this process, and the attention of the highway authority and transport providers should be focussed on this.

4.58. Travel plans, such as those the VOWHDC has been helping to promote with employers at Harwell, will play their part in securing a more sustainable transport network. Failure to develop the network to support continued housing growth would give rise to increased car commuting and consequent traffic congestion along the Grove-Didcot axis, on the A34 and at the Milton interchange. We regard travel plan provision as complementary to, rather than a substitute for, the publicly supported transport infrastructure and service investment that the area needs. Our

recommendation **R6.1** in Chapter 6 indicates how we consider the Structure Plan should reflect this need.

4.59. There was general support for the possible re-opening of the former Wantage/Grove rail station. However, we agree with the majority of EIP participants who consider that the re-opening should not be a pre-requisite for the acceptability of strategic housing development at Grove. We are conscious of the legal, financial, commercial and operational issues that have to be resolved before a new or re-commissioned rail station can become a reality. Nevertheless the DSP housing proposal and the local benefits to all those living and working in Wantage as well as at Grove would further strengthen the case for the station, and give more modal choice for some journeys to work, particularly to Didcot.

4.60. Given the scale of development proposed at Grove, we regard doubts expressed about the ability of planning obligations to secure the full range of infrastructure and other benefits that would be necessary or desirable to be provided in association with the development as unduly pessimistic. It is a legitimate expectation of the planning system to seek such benefits as fall within the guidance on planning obligations, although we accept that aspects of transportation improvements may fall outside the reasonable scope of the obligation system. What could be regarded as 'reasonable benefits' are currently described in Annex B to Circular 1/97. Whilst we recognise that it may be difficult to deal with questions of infrastructure backlog under this process, it is the responsibility of the District Council to determine with the developers what matters can and should be negotiated under this category.

4.61. Representations were made at the EIP and in writing about the possible impact of major new housing development at Grove in increasing the risk of flooding from surface water run-off either on the land to which it related, or, as a 'knock-on' on other land or property in the vicinity. We did not have the benefit of the participation of the Environment Agency at the EIP session on Grove, but the Agency later responded in writing to our specific request for advice as to whether flood risk was a matter which affected the principle of strategic housing development at Grove on the scale proposed in DSP Policy H1.

4.62. The response from the Environment Agency dated 19 October 2004 makes it clear that whilst development on the scale proposed could result in increased surface water run-off if the requisite sustainable drainage systems are not put in place, there is no reason for the development either on the airfield site or elsewhere around Grove not to be viable in strategic terms, provided the developer makes an allowance for the necessary land take required for surface water balancing facilities. For development on the scale proposed it would be appropriate to require a full flood risk assessment to be carried out. We conclude in these circumstances that flood risk is not a reason for deleting or reducing the DSP provision of about 2,100 dwellings at Grove.

4.63. Representations were also made on behalf of Williams F1 who occupy premises near Grove. It was put to us that the company's operations generate noise emissions of such a nature as potentially to influence a decision on the location and extent of further housing development at Grove. Given the nature of the EIP process we did not hear, nor were we offered, any detailed evidence on this matter and are not considering any specific sites within the context of the Structure Plan. Nevertheless,

we find no difficulty in concluding that even if the noise impact of the company's activities is a material consideration, it is a matter to be dealt with at the local plan/local development framework level, or in the context of a planning application. We do not therefore consider that the representations made affect our overall conclusion that the proposed DSP housing provision for Grove is appropriate.

4.64. We have also considered whether there is a case for the Structure Plan to be any more location-specific in relation to housing development at Grove. Whilst the VOWHDC would favour as a suitable site the former airfield it is promoting in its Local Plan, others would favour land to the north of Grove, whether because of proximity to the potential Grove rail station site, or for other reasons. However, we do not consider it necessary to recommend any more specific locational preference for the housing development in the Structure Plan than Grove itself, taking the view that the relationship to the existing settlement is a matter more appropriately dealt with in the local plan/local development framework process. Our recommendation **R4.1** therefore endorses the DSP proposed provision for Grove as incorporated in the proposed pre-EIP changes.

Witney

4.65. The DSP proposed a housing allocation of 6,500 for West Oxfordshire District, with 2,700 identified for Witney. These figures were increased in the pre-EIP changes to 6,800 and 3,000 respectively. West Oxfordshire District Council (WODC) found the increase in the Witney apportionment acceptable, but objected to the overall increase for the District, submitting that the residual 'rural' figure should have been reduced accordingly to maintain the overall DSP District figure of 6,500. Two development consortia with an interest in housing development in or adjoining Witney take different views on the Witney allocation, one advocating a further increase to 3,300, the other reversion to the DSP figure of 2,700. It is suggested by a further developer that the District-wide increase to 6,800 is appropriate, but that the additional 300 dwellings should be allocated to the rural area rather than to Witney.

4.66. Witney has for some time been identified in the Structure Plan as one of the country towns to which new development should be directed. It has an attractive town centre with a range of retail and other uses which make it a suitable service centre for those resident in the town and surrounding rural area. Of the proposed revised Structure Plan allocation for Witney, only about 500 dwellings is entirely new provision, the remainder being committed or the subject of proposed allocations in the emerging West Oxfordshire Local Plan to 2011, which was the subject of a public inquiry at the same time as the EIP. Delivery of housing has been relatively slow due to delays in the provision of related infrastructure, but the position is now improving. We accept that many infrastructure needs are capable of being satisfied through the development process and planning obligations.

4.67. Three issues predominated in submissions about the extent to which Witney can grow in housing terms throughout and beyond the Structure Plan period to 2016. The first is the extent to which new development would exacerbate local traffic congestion, particularly in the town centre during peak hours. The second is the

extent to which such development would place additional and unacceptable burdens on the A40 road due to increased commuting by car to Oxford. The third is whether further housing growth would maintain a satisfactory housing/employment balance in the town.

4.68. It was made clear by the Witney Town Council and others that local traffic congestion is an ongoing issue. Measures to deal with it such as the West End Link and Cogges link are themselves subject to some controversy or difficulty and to delay in implementation. The proponents of development at North Witney suggested that these measures can be provided or supported by enabling development. The promoters of the North Curbridge development area confirm that the committed development of that area is not dependent upon either road link. It is proposed that North Curbridge would be connected to the A40 by means of a new junction to the south of the development, enabling the town centre to be bypassed. The OCC/WODC joint consulting engineers have concluded that traffic from North Curbridge would not have an adverse impact on key junctions within Witney or its fringe central area.

4.69. The developing consortium's transport consultants have assessed traffic flows on the A40 arising from their client's advocated housing provision at Witney of 3,300, and concluded that the resultant new housing component of 800 at North Curbridge would have a negligible impact on traffic flow on the A40 between Witney and Oxford. However, the existing peak time congestion on the A40 is widely recognised, and we consider it logical to assume that the committed development at North Curbridge, quite apart from the new development element, will add to that congestion to some degree. That leaves the decision as to what highway or transport measures to promote along the A40 or in the Witney-Oxford corridor as an important consideration.

4.70. We note that there has been a reasonably good employment/housing balance in Witney in recent years. We do not therefore consider that there is any justification in these terms for restraining housing development in Witney at a level lower than that proposed in the pre-EIP changes. We would expect monitoring to continue in future years to ensure that the balance is not unduly upset. We agree with the view that, notwithstanding its past and present infrastructure shortcomings, Witney is the most sustainable settlement in West Oxfordshire for housing development. We therefore see more justification for maintaining the housing provision for Witney proposed in the pre-EIP changes than reducing it in favour of other settlements in the District, or in the rural area. The circumstances of the rural area are considered in more detail later in this Chapter.

4.71. We note that there has been a slight reduction in commuting between Witney and Oxford in recent years. However commuting is still a strong force, and the Structure Plan with its link to the LTP should help to promote an improvement in modal transport choice in the Witney-Oxford corridor, whether in the form of express bus routes and dedicated lanes, or by consideration of the viability of a light rail link. Our recommendation **R6.1** in relation to Policy T1 is intended to contribute to that focus.

4.72. A high proportion of the housing provision for Witney in the DSP/pre-EIP changes is already committed or the subject of proposals in the Local Plan intended to

satisfy the adopted Structure Plan's housing provision for West Oxfordshire. We therefore doubt whether the argument that no further housing development should take place in Witney until all local and A40 congestion has been alleviated is a tenable one. The challenge of promoting more sustainable travel between Witney and Oxford is nonetheless a pressing one. The need to find a solution to local traffic congestion although an important task is not in our view a matter that can reasonably justify a Structure Plan housing provision lower than the general level proposed in the DSP or pre-EIP changes, particularly when road infrastructure related to the committed development is being designed to minimise the local impact.

4.73. As to the precise level of the Witney apportionment, we do not find the case for increasing it beyond the 3,000 proposed in the pre-EIP changes to be a compelling one, even taking into account the potential for development-funded infrastructure. We are satisfied that a steady delivery of housing in Witney until at least 2011 is more assured than it has been in the recent past, and the provision for Witney can and will require to be reviewed through the PPG3 'plan, monitor and manage' approach, in the light of proposals for the Oxfordshire Districts in the South East Plan and in the preparation of local development frameworks. Our recommendation **R4.1** proposes that the provision in the pre-EIP changes for West Oxfordshire including Witney be taken forward in the adoption of the Structure Plan.

4.74. The WODC Evaluation Report 'Expansion of Witney Which Way?' (2001) identified for assessment three directions for development growth at Witney, namely to the north of Witney, east of Witney and north of Curbridge. Much of the committed development to be undertaken in the next few years will be to the west of the town. However our general view is that there is no justification for the Structure Plan to identify any more specific development locations in relation to Witney and other towns outside Oxford discussed in this Chapter than references to the towns themselves. We consider that more specificity will be needed at Witney when the growth implications of the South East Plan are known and a review of the emerging Local Plan through a local development framework for West Oxfordshire is undertaken.

Development in smaller towns and rural areas

4.75. The discussion under part (g) of EIP Matter 2B considered housing development outside the main towns and locations identified in DSP Policies H1 and H2. A number of representations called for a less restrictive policy towards development in small towns and villages, and for this to be reflected in fuller guidance in the Structure Plan. Among the places mentioned in this context were Carterton, Chipping Norton, Faringdon, Henley, Thame and Wallingford. These views were allied to the issues discussed under the general policies of the Plan in relation to rural areas (see paragraphs 2.11 to 2.14 above) and the rural economy (see paragraphs 5.18-5.19 below). It is relevant to note, for example, that the places mentioned above are listed in Policy E2 as locations for making available a limited amount of employment land, but the DSP gives no comparable steer on housing provision.

4.76. The housing provision allowed for the smaller towns and rural areas is in effect the residual amount of the provision in Policy H1 after deducting the amounts allocated to specific locations. On the basis of the pre-EIP changes, and assuming the provision for Didcot is apportioned 4000 to South Oxfordshire and 500 to Vale of White Horse, and that in Cherwell there would be a net increase of 700 dwellings at Upper Heyford, the imputed provision for rural areas and small towns would be: Cherwell – 1650 dwellings; South Oxfordshire – 3500; Vale of White Horse – 4550 and West Oxfordshire – 3800. All these figures should be regarded as approximate. For the county as a whole they amount to about 13,500 additional dwellings or 36% of the total over the period 2001 to 2016. Although some development industry participants questioned the adequacy of this provision, alternative figures were not generally offered. In many instances the case being made was related to particular development opportunities at one or other of the settlements mentioned, and what was sought was a regime more sympathetic to development, rather than a numerical allocation.

4.77. Most of the District Councils considered the allocations to their areas to be at the right level. The comparatively low figure at Cherwell was a reflection of the fact that outside the main towns of Banbury and Bicester there are few other settlements of a significant size. In South Oxfordshire and Vale of White Horse the figures were felt to be adequate to meet local needs of towns such as Henley, Wallingford, Abingdon, Wantage and Faringdon, and the smaller settlements in those Districts. West Oxfordshire, however, objected to the District's allocation of 6800 in the pre-EIP changes on the grounds that the 3800 assumed for the District outside Witney was too high. The District Council argued that this level of growth in rural West Oxfordshire is unsustainable given the relative remoteness of the area and dependence on the private car for movement, and called for a reduction of 300 dwellings.

4.78. Detailed assessments of the housing requirements of small towns and villages are beyond the scope of the Structure Plan. We take the view that the provision in Policy H1 appears to be of the right order, given the general focus on urban areas for delivering most of the county's additional housing. A further consideration is that a key part of housing needs in rural areas is for affordable housing. Simply increasing the total provision would not ensure the delivery of more affordable housing. Furthermore, any such housing provided through the rural exceptions policy would be additional to the allocated total. For West Oxfordshire, while we understand the District Council's concern to avoid excessive housing development in remote areas, the various Structure and Local Plan policies designed to prevent inappropriate development in rural areas should help to prevent this. The District contains some settlements, such as Carterton and Chipping Norton, whose local development needs should be accommodated, and the County Council also argued that additional capacity for 300 dwellings had been identified in the District outside Witney. We also note that the proposed provision of 3800 for rural West Oxfordshire would be less than the 4050 in the adopted Structure Plan. Accordingly, we conclude that the proposed provision is appropriate and recommend no change in the Structure Plan figures set out in the pre-EIP changes.

4.79. On the question of whether the Structure Plan should give fuller guidance for the smaller settlements we have recommended an adjustment to Policy G1 to give a

fuller reflection of the local needs of smaller towns and villages in the light of guidance in PPS7 (see **R2.1** in Chapter 2 above). Consistent with that we take the view that the final sentence of DSP paragraph 7.3, in saying that development in small settlements and villages “will not normally be appropriate”, does not strike quite the right note. The point, as the rest of the sentence indicates, is that the development that is appropriate in those places will be confined to what is required to meet local needs and support balanced communities. Otherwise we consider that this sentence is an important adjunct to Policy H1, and could usefully be included in the Policy. We recommend accordingly at **R4.4**

4.80. Some participants called for Policy H1 to give fuller guidance for a second tier of towns, below the “country town” locations listed in the second paragraph of the Policy. These towns include Thame, Henley and Abingdon among others. At Thame in particular, development industry participants argued that there was considerable scope for additional housing development, and this could provide a sustainable alternative to other options for meeting the requirements in central Oxfordshire. We commented in Chapter 2 on the fact that Oxfordshire has never set out a full hierarchy of market towns and service centres in the Structure Plan and concluded that we did not see the case for introducing one now (see paragraph 2.13). We take a similar view in relation to Policy H1. Under that Policy any proposal for significant development at Thame, or any other town, would need to satisfy the criteria that development “should take place in larger settlements where a reasonable range of employment, services and community facilities exist, are planned or can be provided at reasonable cost”. Making specific allocations to Thame or other settlements would be liable to introduce inflexibility and a level of detail which overlaps unnecessarily with local plans. Moreover the circumstances of Thame, Abingdon and other “second tier” towns vary considerably, and would not be amenable to being treated as a single category in the Structure Plan. In our view such matters are best covered at the local level.

4.81. The final issue to be considered is the suggestion that the time has come to break out of the country towns framework and provide a new settlement to make a substantial contribution to future development in Oxfordshire. This suggestion was advanced in connection with a proposal for such a new settlement outside the Green Belt to the east of Oxford. Among the advantages claimed for this proposal are that it would meet development needs of the Oxford city-region while avoiding increasing pressure on the A34 or taking land from the Green Belt. We have considered this proposal in the light of our deliberations on the overall housing requirements for the county, and the Structure Plan proposals for meeting them. It would be some years before any new settlement could provide significant additional housing, and many issues concerning employment, transport and other infrastructure requirements would have to be resolved before development could progress. For the immediate future, our conclusions above support the County Council’s proposals for the total housing requirement and the approach to meeting the needs of Oxford and Central Oxfordshire. Against this background we see no need to provide for a new settlement proposal to be considered in the context of this Plan. As we have concluded in Chapter 2 above, however, all the options for meeting the development needs of the county beyond the limited horizon of this Structure Plan will need to be comprehensively reviewed. A new settlement beyond the Green Belt would form part of such a review.

Recommendations

R4.1 Replace Policy H1 with the amended wording for that policy as set out in paragraph 8 of the Proposed Pre-EIP Changes document, April 2004, as follows:

H.1 Provision will be made for about 37,300 additional dwellings (net) between 1 April 2001 and 31 March 2016. The provision will be distributed as follows:

Cherwell	9,350
Oxford	6,500
South Oxfordshire	7,500
Vale of White Horse	7,150
West Oxfordshire	6,800
Total	37,300

The main locations for new housing will be within Oxford (about 6,500 dwellings), Banbury (about 3,700 dwellings), Bicester (about 3,300 dwellings), Didcot (about 4,500 dwellings), Witney (about 3,000 dwellings) and Grove (about 2,100 dwellings).

(The two final paragraphs are amended by our recommendations **R4.4** and **R3.2**.)

R4.2 Amend Policy H2 as follows:

(i) Replace part (a) by the following:

Land at Upper Heyford will provide for a new settlement of about 1000 dwellings and necessary supporting infrastructure, including a primary school and appropriate community, recreational and employment opportunities, as a means of enabling the heritage interest of the site as a military base with Cold War associations to be conserved and appropriate environmental improvements to be carried out.

(ii) Replace part (b) by the following:

Proposals for development must reflect a revised comprehensive planning brief adopted by the District Council after consultation with the site owners and English Heritage and demonstrate that the conservation of heritage resources and carrying out of landscape works and management, restoration, enhancement of biodiversity and other environmental improvements will be achieved across the whole of the former air base in association with the provision of the new settlement.

(retain part (c))

R4.3 Amend paragraphs 7.6 and 7.7 of the explanatory text to reflect the changes to Policy H2.

R4.4 The final sentence of paragraph 7.3, revised as follows, should be incorporated into Policy H1 after the words “well served by public transport”:

In small settlements and villages housing development will be limited to that required to meet local needs and support balanced communities in villages.

CHAPTER 5: THE ECONOMY

General issues

5.1. At the centre of the debate in EIP Matter 3 was the issue of whether the Structure Plan takes a sufficiently positive approach towards the economy of Oxford and the county. The County Council affirmed its commitment to sustaining the county's advantageous position in the South East region as a pioneering, productive and world class economy. The Council pointed to the objectives and principles of the Plan, as set out in section 2 and the economic strategy in section 6. The approach is exemplified by paragraph 6.4 which talks about "building steadily on Oxfordshire's strengths and providing opportunities for local people, but not on a scale that encourages significant commuting into the area or which attracts large footloose firms or large warehousing and distribution facilities". Most of the District Councils, some amenity groups and others supported this approach. The element of restraint of employment growth and development was particularly welcomed for protecting the county's important environmental assets.

5.2. It was this element of restraint that was of concern to the Plan's critics. A number of developers and other participants argued that the economic importance of Oxford, and the competitive nature of the world economy, required a much more positive and pro-active planning stance. It was suggested that the Plan should provide much more opportunity for employment development, and that without this the county would lose its economic edge. Attractive though Oxfordshire is, it was argued that unless there was scope for expansion it risked losing people who form its intellectual capital to other cities competing in the global market. Business organisations, while not necessarily allying themselves to specific demands for more development, also took the view that the county needs to foster the development of those sectors relating to its economic strengths. Oxford City Council took issue with the established Structure Plan policy of restraining employment growth in Oxford, arguing that the City needed more land to meet the demands of research and development and high-tech, knowledge based firms. We consider the issues more particular to Oxford in paragraphs 5.7 to 5.15 below. Elsewhere in the southern part of the county participants pointed out that major concentrations of employment associated with the county's leading-edge sectors at Harwell, Culham and Milton Park are completely ignored by section 6 of the DSP.

5.3. This discussion linked with the role of clusters and whether the DSP sufficiently recognised their importance. Those having a high profile in the county include education, health, science and technology including biotechnology, and motor industries. SEEDA, GOSE and a number of other participants called for a specific policy relating to cluster development. Some other participants, however, pointed to the dynamic nature of clusters and the fact that they evolve through time. The spatial considerations are also complex, as some clusters extend over a number of adjacent counties, while certain activities seek very specific locations.

5.4. We note that there is wide support for the aims of the DSP in relation to the economy. These are acknowledged to be in line with the Regional Economic Strategy and Oxfordshire's own Economic Development Strategy. Even those calling for a

significant change of emphasis in the Plan recognise the importance of protecting the heritage and environmental assets of Oxford and the county, not only in their own right but as part of what makes it such an attractive and economically successful location. Developers are obviously ambitious for greater opportunities. Beyond that, however, we find considerable agreement about what is required to support the county's economy. One aspect is "smart" growth which is not necessarily about large land requirements so much as providing the variety and flexibility needed in a fast changing economy. This may mean a variety of opportunities, including start up and incubator space. Equally important are other actions supporting a move to higher order activities in the knowledge-driven economy, including skills development and the provision of essential infrastructure. The latter includes modern information and communications technology as well as the transport facilities necessary to serve business and promote sustainable travel to work.

5.5. We take the view that, while the DSP's overall approach clearly allows for or envisages such actions, the policies themselves do not carry this forward from the aims and objectives with sufficient certainty. Policies E1 and E2, for example, focusing on the provision of land for employment, understandably dwell on the circumstances and limitations for such development. They would not, however, be instantly recognisable to an observer as the key policies to give effect to the general approach of DSP paragraphs 6.1 to 6.4 which stress, among other things, that a successful economy is fundamental to ensuring that the quality of life in Oxfordshire is protected and improved. Thus, while paragraph 6.3 could be taken as underlining the importance of the growth of the knowledge-based economy in the south of the county, this does not find expression in the policies. There are of course limitations to what can be said within the land use scope of a Structure Plan, but the Policies could convey more of a spatial planning approach which relates employment development more clearly to the other policies and priorities of the Plan, and reflects more fully the county's Economic Development Strategy. We conclude that this could be achieved by a new over-arching Policy, to come before the present E1. Our recommendation **R5.1** proposes such a Policy. The existing Policies E1 to E5 would need to be renumbered accordingly as E2 to E6.

5.6. With regard to clusters, there is in our view a risk that trying to make specific provision in the Structure Plan for cluster development would be counter productive. Detailed locational policies or criteria are likely to be far too inflexible for the kind of dynamic response that cluster related activity may require. We sense that what those calling for a policy on clusters are seeking is fuller recognition of the need for such flexibility and of the importance of the county's key clusters rather than a detailed policy. As the DSP stands, clusters are only given a passing mention in Policy E2 dealing with development at Banbury, Bicester, Didcot and Witney. Rather than provide a separate policy on clusters, our recommended new Policy at **R5.1** contains a broader reference to the importance of clusters and their needs.

The Oxford Economy

5.7. As mentioned at paragraph 5.2 above, Oxford City Council maintained its opposition to the restraint of employment growth within the City. The Council argued that land availability for employment had declined steadily and job numbers in the

City (according to Annual Business Inquiry figures) had only grown by 1.7% between 1995 and 2001 compared with between 15% and 38% in the other Oxfordshire districts. The County Council, however, preferred Census figures showing an increase of 11% in jobs in Oxford between 1991 and 2001, and argued that the City was seeing “smart growth” which increased prosperity without necessarily requiring more employees or greater travel. Various comments were made about the rate at which existing permitted or planned developments to provide employment space were being used up. Thus, while for some the point that the Science Park was less than two thirds full indicated that sufficient space was available, for others it meant that it only had one third to go and that space would run out in a few years.

5.8. Allied to concerns about lack of space for the Oxford economy to grow were calls from the City Council and others for reinstatement of the proposed urban extension at Grenoble Road, including the extension of Oxford Science Park. Others used the same argument in support of proposals for development elsewhere in the Green Belt. A number of participants stressed the importance for key educational and science based institutions of being within or close to Oxford. It was argued, for example, that dispersal to the country towns was not an option for Oxford Brookes University, or for innovative and growing businesses that will only “spin out” a certain distance from their origin.

5.9. A more specific concern about Policy E1 was its apparent support for the loss of employment land to housing. The County Council argued that this was in line with national priorities and the guidance in PPG3, but Oxford City Council’s view was that it conflicted with national guidance about ensuring the availability of land for small firms and the aim of maintaining high and stable economic growth.

5.10. The issues discussed correspond to those on housing in Oxford under Matter 2B and are, it seems to us, an inevitable consequence of Oxford’s position as a thriving City tightly constrained by the Green Belt. We note that the wording of Policy E1 has been changed from that of its counterpart in the adopted Structure Plan, arguably going some way towards addressing the City Council’s concerns. Thus the DSP does not repeat the adopted Policy’s statement that provision of land for class B uses “will be restrained”. On the re-use of employment sites for housing and mixed use, the only proviso in the existing Policy is that this should be environmentally acceptable, whereas the DSP makes an exception where the premises provide for small scale businesses. The County Council also argued that it has not sought outright restraint of jobs in and around Oxford. Thus it has supported exceptional cases such as the release of green belt land for BMW and for the Begbroke Business and Science Park. The Council also argued that Policy E1 would not preclude employment as part of a mixed-use scheme for redevelopment of areas such as the “West End” of Oxford. One could also infer that, in resiling from the urban extension proposal, the County Council acknowledges that the employment element that would have been provided there should, like the housing element, now be accommodated within the City.

5.11. We find that, in the absence of a case on housing grounds to justify including the proposed urban extension in the Green Belt, it would be difficult to justify such an exception on employment grounds alone, either at Grenoble Road or another location

in the Green Belt. We note that there has been a certain amount of pragmatism on the part of the Local Planning Authorities when dealing with proposals of major economic significance in the Green Belt or elsewhere in the sub-region surrounding Oxford. While this may have meant difficult and time consuming negotiations in some cases, it may be the best support the planning regime can give to the special kind of development the wider Oxford economy needs without opening the way for less specialised, space intensive operations such as warehousing. There appears to be a wide consensus that the latter is not an appropriate use of the limited physical opportunities in and around Oxford.

5.12. Despite the above conclusion, we are not convinced that the details of Policy E1 as currently drafted contain the right formula. This perhaps stems in part from the fact that the Policy is an amended version of its predecessor, rather than an attempt to deal anew with the current and future needs of Oxford and its economy. For example, limiting employment generating uses to land already used or allocated for that purpose would not necessarily fit the far reaching change that would come about in conjunction with the future redevelopments and the station relocation proposal mentioned in DSP paragraph 2.7. We could envisage that such schemes might well include substantial employment provision not necessarily on land previously allocated or used for employment, as part of a comprehensive approach with a mix of uses including housing and town centre and other facilities. We have no doubt that this is an approach that both County and City Councils would support.

5.13. In relation to the re-use of employment land for housing, we recognise that there are complex realities behind the apparently simple guidance in PPG3. That stresses the importance of avoiding the waste of urban land that can arise from maintaining allocations for employment and other uses which cannot realistically be taken up when the land could well be used to provide much needed housing. We note that this guidance would be amplified under a proposal published by ODPM in July 2003, but the central message is the same: the principal concern is with the re-use of land and buildings no longer required for employment use, or employment land allocations that have no realistic prospect of being taken up. In recognising Oxford's need for housing and mixed use development, the County Council apparently seeks to go further than PPG3 in the second part of Policy E1, which favours changes of use from employment, except for the small scale businesses referred to in the Policy. Oxford City Council, on the other hand, argues that the circumstances pertaining to the PPG3 advice do not apply to Oxford, which has a shortage of employment land, particularly, but not only, premises for small scale businesses.

5.14. We take the view that the requirements in PPG3 for the review of employment land allocations apply to Oxford in any event, and fall to be followed at the Local Plan level. How much additional redundant employment land will be found for housing as a result is not something for us to consider here, but in the light of the discussion in Chapter 4 above of the extent of urban capacity already identified, it may be considerably less than in some other places. On the other side of the coin we appreciate that Oxford does need, as far as is compatible with the other objectives and policies of the Structure Plan, to seek to ensure a supply of accommodation of the type and size needed by the diverse economy within the City, including small scale

businesses, a point which Policy E1 as drafted seeks to recognise. We conclude that this part of the Policy should be retained but in a modified form.

5.15. In the light of the conclusions in paragraphs 5.12 and 5.14 above we recommend at **R5.2** that Policy E1 be revised and expressed in a more strategic way so as to avoid a detailed development control approach more appropriate to the Local Plan.

Provision elsewhere in the county

5.16. Many of the criticisms made by EIP participants and others about DSP Policy E2 were made in the context that it was the only general policy relating to employment development outside Oxford City. The new over-arching Policy which we recommend at **R5.1** will address many of these concerns. For example it provides a clearer link between employment provision and the planning of development so as to encourage sustainable travel to work, and with the priorities established in the RES and EDS. Unlike the housing policies, Policy E2 also makes reference to employment in locations other than the four main country towns. This aspect of the Policy has been generally welcomed. Some participants representing interests in the smaller towns sought removal of the word “limited” in the Policy relating to employment land in those towns. The argument was that this could restrict the needs of medium and larger businesses in those towns. The County Council argued that unlimited release would conflict with the Plan’s focus on the larger urban areas.

5.17. In the pre-EIP changes the County Council proposes to amplify Policy E2 in relation to the smaller towns by referring to action plans carried out following health checks and other processes, and supporting the release of land for employment where this is needed to maintain the vibrancy of market towns. This also was widely welcomed as an improvement which meets the concerns of many of those making representations about the needs of the smaller towns. With this change, and within the context provided by our recommended new Policy E1, we do not see any further need for improvement of this Policy. We accept the County Council’s argument in favour of retaining the word “limited”, which still leaves flexibility for the Local Planning Authority to assess what scale of employment is required to meet the needs of individual settlements. Accordingly, we recommend at **R5.3** that Policy E2 is modified in line with the pre-EIP changes.

The rural economy

5.18. There was considerable support for the way the Structure Plan has approached the rural economy, although some participants regretted that the DSP does not retain a separate section on the rural economy and Policy E6 from the adopted Plan. Instead the previous Policies E4 and E6 have been combined in DSP Policy E3 covering small firms and local employment diversity. One effect of this is that the floorspace limitation of about 500 square metres that previously only applied to local and small businesses also applies in the new Policy E3 to proposals for farm and rural diversification. On the other hand, some saw the broad-brush approach of the Policy as providing more flexibility for village businesses and other needs of the rural economy than the rather more prescriptive adopted Policy E6. The 500 sq.m.

criterion would not rule out agricultural development which required buildings on a larger scale. As the County Council pointed out development involving larger buildings for energy production from biomass which may be seen as rural diversification, would be supported by Policy EG1.

5.19. We take the view that DSP Policy E3, although concise, does deal adequately with small scale local employment issues. Taken together we consider that this Policy together with Policy E2 as amended and with the amendments we have recommended elsewhere to Policies G1 and H1 (see **R2.1** and **R4.4**) provide an adequate framework at the Structure Plan level for addressing the needs of the rural areas and small communities. Accordingly we recommend no change to DSP Policy E3.

Recommendations

R5.1 Insert a new Policy E1 under the heading “**Provision for employment development**” to read as follows:

Development for employment purposes should be located so as to meet the objectives and priorities of this Plan. In particular it should:

- **provide for the requirements of activities which contribute to regional and local priorities for economic development. This includes providing a range of accommodation for small businesses and innovation, skills development, business infrastructure and linkages within the knowledge based economy;**
- **accord with policies for protecting the county’s important environmental assets;**
- **be located mainly in or adjoining urban areas or in existing concentrations of employment with good accessibility from residential areas, particularly by non-car modes of transport;**
- **as far as practicable incorporate measures to encourage shorter journeys to work and travel on foot, by cycle or public transport;**
- **not be of a scale or character that gives rise to large increases in commuting into the area or low intensity uses of land which generate heavy traffic on local roads.**

Priority should be given to development which supports educational, scientific and technological sectors and responds to the needs of established and emerging clusters within the county.

The supporting text in paragraphs 6.1 to 6.6 should be adapted to set the context for the above policy.

R5.2 Revise Policy E1 (to become new Policy E2) to read as follows:

In Oxford, development for employment uses will be expected to take place primarily on previously developed land or in conjunction with redevelopment schemes for mixed uses incorporating housing, town centre or other facilities. Development should have regard to the priorities set out in Policy E1 and to the objective of providing a range of accommodation for businesses in Oxford and

contributing to the diversity of local employment opportunities, while maintaining or improving the balance between jobs and resident workforce in the City.

Where employment use of a site ceases, its future use should be assessed in the light of the above considerations, its suitability for alternative uses and whether there is a realistic prospect of it being re-used for employment purposes.

R5.3 Revise Policy E2 (to become new Policy E3) to include, after the sentence referring to land for employment in Abingdon....Wantage and Grove, the following additional sentences:

In deciding on the amount of employment land available in the above towns, weight shall be given to the content of action plans that have been carried out following health checks and other processes. Where such plans show the need for additional land to maintain the vibrancy of market towns, then additional employment land shall be released.

CHAPTER 6: TRANSPORT

Introduction

6.1. The Government recently drew attention to the challenge that faces the nation as a result of economic growth resulting in an increasing demand for travel, past planning policies and demographic changes driving a trend towards longer journeys, the growth in car travel and the implications of population changes, compounded by historic under-investment in our transport system¹. These circumstances clearly apply to Oxfordshire, and coloured the nature and tone of the debate at the EIP about the Structure Plan's transport provisions. However what we learned from the debate is that the shortfall in infrastructure does not so much relate to the regional dimension as to the local; the adverse effects we heard about most often related to congestion and difficulties of movement within the county.

6.2. The Panel recognises that the County Council has experienced difficulty in presenting anything more than generalised transport policies in the Structure Plan. The preparation of the Plan is not integrated with the review of the 5-year Local Transport Plan (LTP). The outcome of initiatives such as the Transport Networks Review (TNR) and the assessment of the Expressway Oxford project have only recently become available. It is in this rather uncertain climate, including the almost universal acceptance that the County has not had the investment in transport infrastructure to fully support its 'country towns' strategy, that the Panel has to consider the adequacy of the Plan's transport provision.

Consistency with national/regional transport guidance

6.3. The Regional Transportation Strategy (RTS), published in July 2004 as a replacement for the strategy in RPG9, became part of the development plan on 28 September 2004. RTS Policy T1 calls for investment to support inter alia the region's inter-regional movement corridors, the development of a network of regional hubs and spokes, and facilitating urban renewal and renaissance as a means of achieving a more sustainable pattern of development. Oxford is identified as a regional hub and certain objectives are identified under RTS Policy T4 to enhance its role as such. Regional spokes are identified on Map 2 in the Annex to the RTS as emanating from Oxford towards Birmingham, Swindon, Reading, London and Milton Keynes.

6.4. We regard the regional spokes shown on Map 2 as conceptual rather than indicative of any express provision that should be made on the ground. Our attention was drawn to the work being undertaken by the Thames Valley Multimodal Study and the transport proposals in the Berkshire Structure Plan 2001-2016 which identify the need to consider 'additional capacity for crossing the River Thames in the Reading area'. Such a facility would support at least in part the concept of a regional spoke between Reading and Oxford. Whilst we are aware of difficulties that arise in crossing the Thames in the general area which includes pinch points such as that at Henley, there is nothing in the Oxfordshire DSP which indicates in what manner this issue may be addressed. Neither do we have any firm basis for recommending such provision. What we are able to conclude, however, is that the Oxfordshire Structure

¹ *The Future of Transport – a network for 2030* – Department of Transport, July 2004, paragraph 1.1.

Plan does not contain any provision that would obviously preclude the future provision of any additional transport capacity across the River Thames in the Reading area.

6.5. It is perhaps not surprising due to the timescales involved that the DSP does not contain provisions that expressly reflect the roles and expectations of regional hubs and spokes. However, the Panel considers that this theme needs to be introduced into the Plan before it is adopted, not only to provide a strategic input into early preparation of local development frameworks but also to provide a land use planning reference point for the LTP, the review of which the County Council is responsible for undertaking in the near future. RTS Policy T4 requires that development plans and the LTP should provide an integrated approach in relation to regional hubs such as Oxford.

6.6. We accept that some of the spatial linkages that should be reflected in the Structure Plan's transport provisions may not be coincident with regional spokes, although there should be some identifiable measure of integration. It would appear from RTS Maps 1 and 2 that the role of the A34 as an International and Inter-Regional Corridor is a different function to that of a regional spoke, despite the Highways Agency having referred to the A34 in the latter context. However whatever functional label is given to the A34, it cannot be denied that it also serves as a key sub-regional distributor and a vital connecting link between major centres in the County such as Didcot, Oxford and Bicester, and was exercising that function before it acquired its national and international route status. A realistic approach should therefore be adopted as to the involvement of the A34 in more local travel solutions.

6.7. Notwithstanding all of this, many EIP participants accepted that the DSP's transport policies are so far as they go generally consistent with national planning guidance in PPG13. Some however felt that more should have been done to relate the policies in the DSP to a spatial development strategy. The Plan implicitly seeks a continuation of the country towns strategy, with some EIP participants proposing different distributions, particularly in Central Oxfordshire.

6.8. The Panel considers that the Plan should provide a clearer reference to the spatial dimension of the overall transport strategy, with more emphasis given in policy and explanatory text to the implementation of strategic transport infrastructure to support not only new development but also development that is already committed. In considering specific transport proposals we are mindful of the guidance in PPG12 that local authorities should only include transport proposals in plans which are firm, with a reasonable degree of certainty of proceeding within the plan period and identified as such in the LTP. We consider that even if the number of committed transport proposals are few, the Structure Plan should demonstrate conviction and provide a longer-term context for the LTP by expressing clearer priorities for transport to support its strategy, which goes beyond the timescale of the LTP.

Transport and land use/spatial planning

6.9. A number of specific needs for linkages between the development strategy of the DSP and transport infrastructure proposals were identified during the course of the EIP. These included references to fast, efficient public transport systems between

Oxford and the country towns of Bicester, Witney and Didcot and to serve the employment-housing axis of Grove/Didcot incorporating major employment sites including those at Harwell, Milton Park and Culham. The answer to the county's infrastructure shortfall is not necessarily in our view to remove bottlenecks to increase capacity and smooth the traffic flow, but to offer real alternatives that will persuade people to change their travel behaviour.

6.10. We accept that the implementation of some aspects of transport provision lies outside the County Council's direct control. However, partnerships and planning obligations are an established part of transport infrastructure provision and management. Individual initiatives might be at different stages in their development and therefore more appropriately referred to in the explanatory text rather than in the 'upper case' policies. Yet we take the view that if the transport provisions are to be seen to support the main development strategy, then these relationships should be represented in the relevant transport policy itself. Such references would provide a stronger basis for the representation of key schemes in the LTP than the DSP currently offers.

6.11. We recognise that this is already done to some degree in Policy T6 by reference to the Didcot-Oxford-Bicester corridor, but it should be extended to cover the transport needs of other parts of the development strategy. We recommend in **R6.1** and **R6.2** how this might be done, by modifications to Policy T6 which implicitly reflect the regional concepts of hubs and spokes, and to its supporting text. Whilst it was put to us that the role of Oxford as a regional transport hub should be made the subject of a separate policy in the Structure Plan, we do not consider this to be essential. The County Council submitted a map showing the strategic road system on the day of the Transport session of the EIP, but there was little opportunity for participants to comment on it. However, we see some merit in giving emphasis to strategic travel corridors related to Oxford as the regional transport hub, the major development locations and, where appropriate, the regional spokes, and incorporating the strategic road network and rail lines, as an enhancement of the information already on the Key Diagram.

Car parking

6.12. We agree with the suggestion made by GOSE and others that the reference to parking standards in DSP Policy T2 should be that of maximum standards in accordance with the guidance in PPG13. Our recommendation at **R6.3** covers this. The reference to park and ride schemes in the Policy should be adapted to relate such schemes to the regional hubs and spokes identified in the RTS or otherwise to the main development strategy of the Structure Plan. We suggest appropriate wording at **R6.3**.

Public transport

6.13. We recognise the degree to which transport choices have been influenced and public transport use increased in Oxford City by the establishment of measures such as peripheral park and ride sites and the instigation of high frequency bus services. However, the County Council did identify difficulties in incorporating some public transport proposals into the Structure Plan because of the limited influence the Council

had over the extent to which certain transport projects could be brought forward to support the development strategy. An example of this is the Premium Buses Network, which the County Council emphasises is dependent upon the commercial viability of particular services. The Panel recognises this constraint, but is not convinced that it should prevent the identification of high quality public transport needs which could then be taken into the process of preparing the LTP. Otherwise the conclusion might be reached that the strategy should be led by commercial transport factors, an approach we consider should not be the starting point for a sustainable transport policy in a structure plan.

6.14. We understand the reluctance of the County Council to commit infrastructure projects or service provisions to the Structure Plan over which it has little control. However, that is no reason to fail to identify a link between the spatial development strategy embodied in the Plan and the need for high quality public transport to serve those development needs that will give residents and workers real transport choices and help to circumvent traffic congestion with its resultant financial, lifestyle and environmental costs. We consider that a more focussed reference to these needs in the Structure Plan would assist in securing better resources for transport in the County, whether for publicly funded projects or as a product of commercial sponsorship, partnership agreements and planning obligations. Our proposed revisions to Policy T6 reflect this view.

6.15. The Panel is also aware of the inherent difficulties in promoting improvements to the rail network, because of the high capital cost, long lead in times and often complex technical, legal and operational issues involved. We comment briefly on individual proposals referred to during the course of the EIP. The re-opening of the former station at Grove would support the major development that DSP Policy H1 envisages for that settlement and which we support. We accept that such a facility would give better travel choice for residents of Grove and Wantage, particularly in journeys to Didcot, Oxford and Reading, although its usefulness in relation to work journeys to Harwell, Milton Park and other more detached employment locations in southern Oxfordshire is less clear. Reference is already made to this proposal in the DSP, and we agree with the view widely expressed at the EIP that whilst there are good reasons why its implementation should be pursued actively, it should not be a pre-requisite for the allocation of housing development at Grove proposed in Policy H1.

6.16. The DSP also confirms the County Council's aspiration to help to secure the re-opening of a station at Kidlington. This proposal is the subject of some dispute by those promoting a new station at Shipton-on-Cherwell, associated with a major residential and employment development proposal at Shipton Quarry. We conclude in Chapter 4 that there is no justification for reference to be made to such a proposal as a strategic development location, but we accept that significant work has been done on behalf of the prospective developer in assessing the feasibility of a new station, including discussions with the Strategic Rail Authority.

6.17. It follows from our conclusions about whether reference should be made in the Structure Plan to a development location at Shipton Quarry that the station proposal is reliant upon, and would serve little purpose without, development on at least the scale proposed by the developers. Should development supporting the case for the station

proposal be given further consideration in the future, our view is that the travel needs of the existing population of Kidlington should be taken into account as well as those of the new development. We consider that in the light of our conclusions about the Structure Plan's development strategy for Central Oxfordshire there is no justification for a new station at Shipton-on-Cherwell to be referred to in the Structure Plan or its explanatory text.

6.18. It was also suggested by the franchisee for the Chiltern Line between London and Birmingham that there would be merit in establishing a park and ride rail station at Ardley, to the east of the former air base at Upper Heyford which is proposed for some development in DSP Policy H2. The train operating company which we note has a record of securing new rail or rail-associated infrastructure confirmed that the viability of such a proposal would depend upon a 'critical mass' of local population, as illustrated elsewhere by the proximity of residential areas to existing park and ride stations at Warwick Parkway and Haddenham and Thame Parkway. Our conclusion and recommendation in Chapter 4 of this report that the housing development at Upper Heyford should be based on about 1,000 dwellings does not fit this scenario. A park and ride rail station away from any substantial settlement whilst of some benefit in encouraging mode-switch for longer distance journeys, would tend in our view to generate unsustainable local car journeys in the rural area. We do not therefore support a reference to such a proposal in the Structure Plan.

6.19. The company also raised the prospect of a rail station allied to the existing park and ride site at Water Eaton, just to the north of Oxford. We could see some advantages in such a facility particularly serving London-bound services if it were to result in a decrease in traffic levels within the City of Oxford. The benefit to those wishing to commute between Bicester and Oxford is less obvious. The case for such a station is not clear to us in relation to the DSP development strategy, although it could conceivably be argued in the context of the role of Oxford as a regional transport hub. However, that would depend on detailed submissions supported by technical evidence. The suggestion appears to us to be a longer-term aspiration rather than a worked-up proposal. Whilst we recognise that the incorporation of a chord linking the Chiltern Line with the Oxford line at Bicester might facilitate alternative rail routes to London from Oxford (in the context of a regional spoke), it would have less benefit for more locally based journeys. We therefore see no justification for a reference to these matters in the current Structure Plan.

6.20. The Panel recognises that it would be inappropriate to include within the Structure Plan as firm proposals projects with little or no prospect of implementation within the Plan period to 2016. However we consider it vital that the Plan should identify which elements of the County's transportation network need to be concentrated upon, so as to support the spatial development strategy and 'prepare the ground' for further growth of development that is likely to occur beyond 2016, with its attendant travel needs and impacts. For this reason we consider that although reference is made in the explanatory text to DSP Policy T3 to the development of the East-West rail link as one of the County Council's high aspirational objectives, it merits a reference in Policy T6 and its supporting text, as it is a project that would directly support the regional spoke identified in the RTS as linking Oxford and Milton Keynes. This is dealt with in our recommendation at **R6.1**.

6.21. In summary, we consider that the County Council and other players in providing transport infrastructure and operating public transport services would have a stronger hand in bidding for public funds and making judgements about viability if the Structure Plan's transport provisions had more of a cutting edge, related to its development strategy.

Recommendations

R6.1 Replace Policy T6 with the following:

T6 The County Council will promote and support a comprehensive strategy for the safe and convenient carriage of people and freight by road, rail or special track.

The County Council in partnership with transport infrastructure providers, the operators of public transport services and other agencies will in particular promote the development and management of the following principal transport nodes or corridors related to the Plan's overall development strategy and its regional context, to meet both strategic and key local travel requirements:

- Infrastructure and services in and around the City of Oxford to support its role as a regional transport hub;
- between Oxford and Bicester;
- between Oxford and Witney;
- between Oxford and Didcot;
- between Grove/Wantage and Didcot, including provision to serve major employment sites at Harwell, Milton Park and Culham;
- the development within the county of the East-West rail link.

The strategic travel corridors, the rail and trunk route network and the other projects and programmes referred to, are identified on the Key Diagram.

The Local Transport Plan will:

- identify the manner in which the road and rail network and the operation of the premium bus network and other key local public transport services will combine to provide an enhanced quality of travel to support the spatial development strategy of the Structure Plan;
- assign other roads in the county together with any special track to a hierarchy of networks supporting the spatial strategy of this Plan and identify their function at each level of the hierarchy;
- identify network improvement schemes; and
- identify any requirements for integration between networks for people and freight.

Development that would have a significant adverse effect on the safe and efficient function of a network will be resisted.

Land required for network development or improvement schemes will be safeguarded in local plans/local development frameworks.

R6.2 Review and revise the explanatory text to Policy T6 and the Key diagram accordingly.

R6.3 Amend Policy T2 as follows:

- (a) by the insertion of '**Maximum**' before '**standards for parking provision**' at the beginning of the third sentence of the Policy, and
- (b) by the deletion of the last sentence of the Policy and its replacement by:

Park and Ride Schemes will be supported where they support the concept of regional hubs and spokes or otherwise form part of a wider transport strategy for an area.

CHAPTER 7: ENVIRONMENT

Landscape character

7.1. The County Council confirmed that the environment policies in the DSP are largely based on those in the adopted Structure Plan, although the Council acknowledged that the adopted policies should be reviewed in the light of RPG9 and recent Government policy guidance and statements and, particularly in relation to landscape character, PPS7. DSP Policy EN1 requires new development to contribute towards the protection or enhancement of Oxfordshire's landscape character, in particular the Cotswolds and Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty (AONBs) that lie partially within the County.

7.2. The County Council has defended DSP Policy EN1 in the face of criticism that it is not always possible to maintain and enhance the character of the landscape. The Council describes the Policy as providing a three-pronged approach of protection, management and enhancement. The Panel generally agrees with the Council's position. The Policy is not in our view in conflict with objectives in PPS7 firstly to support good quality, sustainable development that respects and, where possible, enhances local distinctiveness and the intrinsic qualities of the countryside, and secondly to offer continued protection of the open countryside for the benefit of all. However, the prefacing of 'enhancement' by 'where possible' would bring the Policy even closer to the PPS7 guidance, and we recommend this modification in **R7.1**.

7.3. In response to a representation that the word 'unacceptably' should be removed from the clause 'damage to the local landscape' in the last sentence of Policy EN1, the Panel takes the view that the term is appropriate. Without it, decisions on development proposals affecting the landscape would not be able to be made on the basis of consideration of a balance of positive and negative factors, including a degree of landscape harm. The use of 'unacceptably' can be taken to be an indication that there may be circumstances in which harm to the landscape will be a decisive factor which justifies the refusal of planning permission, even where works of mitigation and other factors tend to favour the development. We have also considered other textual changes suggested, but recommend no further modification to the Policy.

Biodiversity

7.4. DSP Policy EN2 was criticised as not fully reflecting the guidance in PPG9 which requires Structure Plan policies relating to sites of nature conservation importance to identify sites of differing significance and to establish a strategic framework and exemplify particular characteristics of identified sites in their national and international context, placing particular emphasis on the protection of sites of international importance (SPAs, SACs and RAMSAR sites). It seems to us that Policy EN2 goes some way towards achieving this, but there was support at the EIP for the County Council's offer to incorporate into the Plan a map and schedule for the County identifying sites of nature conservation interest at different levels of protection, following the general approach of Map 4 in RPG9. This is reflected in our recommendation at **R7.2**.

7.5. It was suggested that Policy EN2 should make reference to a need to assess where appropriate possible development sites for their existing nature conservation importance, irrespective of any existing nature conservation designation or the absence of it. The County Council referred to the use of the county-wide OWLS study, and District Councils confirmed the procedures they adopt when considering the wildlife implications of designated and non-designated sites. In these circumstances we see no need to modify the Policy.

Agricultural land quality and soil

7.6. The County Council acknowledged that there was a need to review DSP Policy EN3 to ensure that the Policy accorded with the latest guidance in PPS7 relating to agricultural land quality. The reference to an overriding need having to be demonstrated to develop agricultural land of the best and most versatile grades should be replaced by the recognition of agricultural land quality as one of a number of sustainability considerations, with a general preference being given to the first use of land of the poorest quality. We recommend a suitably amended policy at **R7.3** and the consequential amendment of the explanatory text at **R7.4**.

Historical and cultural heritage; Oxford City and other towns

7.7. DSP Policy EN4, which seeks the preservation or enhancement of the fabric or setting of listed buildings and the character or appearance of conservation areas and the protection of historic parks and gardens, battlefields and historic landscapes, is unchanged from Policy EN8 of the adopted Structure Plan. It was put to us that reference ought to be made to Blenheim Palace and Park which is a World Heritage Site and that the significance of historic landscapes should be explained so as to support the appraisal process.

7.8. Inclusion of a site on the World Heritage list does not confer any additional statutory controls, but PPG15 confirms that it does highlight the outstanding international importance of the site as a key material consideration to be taken into account in the determination of planning and listed building applications. Accordingly the Panel considers that the protection of Blenheim Palace and Park is a matter of strategic weight, and that there should be an express reference to in Policy EN4 and in the explanatory text. This is the subject of our recommendations at **R7.5** and **R7.6**.

7.9. PPG15 identifies conservation of the wider historic landscape as a significant task for local planning authorities, and a matter to be taken into account in the definition of countryside planning policies. We note that assessments of landscape character have been or are being undertaken in relation to the AONBs, and agree that this material and other landscape characterisation surveys should be taken account of wherever available. An expansion to the explanatory text to Policy EN4 should cover these matters. There was also an acknowledgement from the County Council that the text might more appropriately refer to the contribution made by 'enabling' development to the conservation of historic buildings and their grounds in exceptional rather than occasional instances. These matters are dealt with in our recommendation at **R7.7**.

7.10. DSP Policy EN5 was identified by the Government Office for the South East as being more appropriate to the Oxford City Local Plan than the Structure Plan. However, we recognise that the character and setting of the City of Oxford are matters of more than local significance, because the City's character is regarded both nationally and internationally as special and the setting crosses local authority boundaries. We therefore regard Policy EN5 as a measure of strategic significance which should be retained in the Structure Plan. Should there be occasion to review the Green Belt around Oxford, then Policy EN5 would if still extant be a material consideration.

7.11. We were encouraged by English Heritage to consider a further policy which sought to protect the character or setting of other historic settlements in the County. However, there was a wide consensus of opinion at the EIP that notwithstanding the importance of giving protection to other settlements, that objective should more appropriately be achieved through the application of Policy EN4 and policies in local plans or development frameworks. We agree with that view, and consider that broadening Policy EN5 or adding the additional policy suggested could appear to diminish the unique importance of Oxford and its setting.

Archaeology and geology

7.12. The Panel has considered representations that protection for both archaeological and geological features in a single policy EN6 but relating to different statutory systems of protection, could be confusing. PPG16 does not give any express role to structure plans in relation to the protection, enhancement or protection of sites of archaeological interest, but it is clear to us that Oxfordshire possesses a wealth of archaeological resources, only a small proportion of which is to be found in formally recognised sites. We accept therefore that these circumstances merit expression in the Structure Plan and agree it would be preferable for protection to be provided by way of a discrete policy. We suggest a suitable form of policy in **R7.8**.

7.13. As for geology, we accept that national recognition of geological or geomorphological features through sites of special scientific interest (SSSIs, including Geological Conservation Review (GCR) sites) and recognition at regional level through regionally important geological/geomorphological sites (RIGS) also merit policy protection in the Structure Plan. It follows that a separate policy should meet this need, and we recommend appropriate wording in **R7.8**. We also recommend consequential adjustments to the explanatory text for both policies, in paragraph **R7.9**.

Water resources and quality, drainage, pollution and flood risk

7.14. The Panel sees no need to modify DSP Policy EN7 to make it clear that the Policy is intended to refer to surface or ground water quality, because such a clarification is provided by the supporting text. Similarly, we are satisfied that DSP Policy EN8 accords with the guidance provided in Table 1 of PPG25; earlier criticism by the Environment Agency of the Policy was withdrawn by the Agency at the EIP. The County Council had no objection to the suggestions that DSP Policy EN9 should be retitled 'Water Resources and Waste Water Infrastructure' and the Policy text adjusted to accommodate this wider role, and the Council suggested that the need for

early consultation with Thames Water Utilities could be referred to in the explanatory text. Our recommendations at **R7.10** and **R7.11** cover these points.

7.15. DSP Policy EN10 relating to proposals for major new reservoirs is unchanged from Policy EN14 of the adopted Structure Plan. In response to suggestions that the supporting text should emphasise the need to minimise adverse impacts and identify benefits for both the landscape and its wildlife, the Panel notes that these matters are in any event covered by Policies EN1 and EN2. Environmental Impact Assessment (EIA) is also likely to be required for any major new dam, that is, where the construction site exceeds 20 hectares. In these circumstances we do not consider any change to the text to be necessary.

Other matters

7.16. Of the other matters raised in connection with Structure Plan Chapter 5, we accept that the suggestion that reducing pollution should be mentioned in the Chapter as well as in the second objective of Structure Plan Aim 1 has some merit. However, the control of pollution is as important in urban areas as it is the countryside. The Structure Plan's general Policies G1 to G3 implicitly define ways in which pollution can be reduced through the ordering of development and the provision of adequate infrastructure. Policies in local plans and local development frameworks will continue to apply this approach at a more local level. Many of the means of reducing or minimising pollution are in any event subject to separate legislation. We are not therefore convinced that specific mention of pollution in Chapter 5 is necessary.

7.17. We recognise that one of the attractive characteristics of the countryside is its relative tranquillity. However, national planning policy in PPS7 and PPG24 does not suggest any express measures that should be incorporated into development plans with this in mind. The main factors contributing to the maintenance of tranquillity in the countryside are the focus of most development within or adjacent to the main urban areas and the application of other sustainable development principles, such as maintaining a balance between residential and employment development and supporting the provision of public transport infrastructure and other measures that encourage a reduction in the use of the private car. The Panel cannot identify any more specific Structure Plan measure that could serve this cause. We therefore recommend no modification to Chapter 5 on this account.

Recommendations

R7.1 Revise Policy EN1 by inserting '**where possible**' before 'enhancement' in the second line of the Policy.

R7.2 Insert a map and list of designated sites of nature conservation importance with their type and level of designation, to support Policy EN2.

R7.3 Replace Policy EN3 by the following:

EN3 **Development on the best and most versatile agricultural land shall have regard to the quality and productiveness of such land alongside other sustainability considerations. Where significant development of agricultural**

land is unavoidable, areas of poorer quality land shall be used in preference to that of a higher quality, except where this would be inconsistent with other sustainability considerations. Where undeveloped agricultural land is to be developed, any adverse effects on the environment shall be minimised.

R7.4 Amend paragraph 5.9 of the explanatory text accordingly.

R7.5 Revise Policy EN4 by the insertion of **‘including Blenheim Palace and Park, a World Heritage Site’** after ‘listed buildings’ in the first line.

R7.6 Refer to Blenheim Palace and Park and its significance as a World Heritage Site in paragraph 5.11 of the explanatory text.

R7.7 Insert new text in or after paragraph 5.11 explaining that landscape character assessments relating to the AONBs and other parts of the rural area should be taken into account in the allocation of land for development and the consideration of development proposals. Replace ‘occasionally’ by **‘exceptionally’** in the fourth line of paragraph 5.11.

R7.8 Delete Policy EN6 and replace by the following two policies:

EN6A There will be a presumption in favour of preserving in situ nationally and internationally important archaeological remains, whether scheduled or not, and their settings. Development affecting other archaeological remains should include measures to secure their preservation in situ or where this is not feasible, their recording or removal to another site.

EN6B Nationally and regionally important geological features including geological SSSIs and RIGSs shall be protected from harmful development and retained in situ unless there are exceptional reasons justifying their removal, in which event their presence shall be appropriately recorded.

R7.9 Amend the explanatory text in paragraphs 5.13 to 5.15 to reflect new Policies EN6A and EN6B.

R7.10 Revise Policy EN9 by changing its title to **‘Water Resources and Waste Water Infrastructure’**, and inserting **‘and waste water infrastructure’** after ‘water resources’ in the first line of the Policy.

R7.11 Insert a reference to a need for early consultation with Thames Water Utilities in paragraph 5.21 of the explanatory text.

CHAPTER 8: MINERALS

Introduction

8.1. Matter 6 of the EIP did not consider the minerals policies of the DSP in their entirety, but focussed on the two issues of whether the plan makes appropriate provision for sand and gravel working and whether it is right to identify strategic locations for sharp sand and gravel working, specifically the proposed new area at Stadhampton – Berinsfield – Warborough – Benson.

8.2. In written submissions a number of other concerns were raised, mainly about aspects of the adopted Structure Plan policies M1 to M11 felt to have been lost or weakened by the transition to DSP policies M1 to M4. The revised format of the Plan seeks to avoid duplication between the Minerals chapter and those dealing with transport, the environment and waste management. These aspects of the minerals issues were not discussed at the EIP and we make no formal recommendation regarding them. Nevertheless we suggest that before adopting the Plan the County Council reviews the points raised by respondents with a view to ensuring that the issues relating to recycled and secondary aggregates and sustainable transport of minerals, covered in paragraphs 11.17 to 11.22, are adequately linked into the actual policies of the Plan.

8.3. On a more specific issue, we note that in the light of consultation responses the County Council has accepted that recreation can be an appropriate form of after use for mineral working sites. We find this sensible and recommend (**R 8.1**) that recreation is added to the final sentence of Policy M1, as proposed by the County Council.

Provision for sand and gravel working

8.4. The EIP took place while the new regional apportionment for sand and gravel working among the counties of the South East was being considered elsewhere, an EIP of the Regional Minerals Strategy (RMS) having been held shortly before we discussed Matter 6. At issue is whether the Structure Plan should continue to be based on a requirement for 1.96 million tonnes per annum (mtpa) of sand and gravel from Oxfordshire or possibly a lower figure if this is what the RMS determines. Oxfordshire has argued that the requirement should be reduced to 1.73 mtpa. The industry, local authorities and others are agreed that whatever the final RMS requirement turns out to be, it should form the basis for the Plan. It is clear that this figure will not be known until after we have reported, but probably before the Structure Plan is finally adopted.

8.5. Arguments about the total requirement are therefore largely academic in the present context except that, as a number of objectors argued, a lower figure may reduce the need to identify additional areas for working within the county. Therefore, whilst we cannot draw any conclusion about what the county requirement should be or will be, this issue remains in the background to our deliberations about the approach to identifying locations for sand and gravel working. We recommend (**R8.2**) that DSP paragraph 11.5 is revised to reflect the final apportionment figures from the RMS once these are known. We also concur with the view of GOSE that it

would be helpful if the explanatory text gave an indication of how the policy framework for minerals will evolve from the present system of Structure Plan and Minerals and Waste Local Plan (MWLP) to the new arrangements for the Minerals and Waste Development Framework (MWDF). In general all references to the MWLP should be replaced by appropriate references to the MWDF. These matters are also covered by our recommendation **R 8.2**.

Strategic Resource Areas

8.6. Policy M2 of the DSP continues the approach of previous Structure Plans of designating “strategic resource areas” for sharp sand and gravel working. Such areas, while their boundaries are not precisely defined, are in effect preferred areas or areas of search for sand and gravel working. More specific locations are identified in the MWLP or in future in the MWDF, the presumption being that the locations will lie within the Strategic Resource Areas, except where other locations are found appropriate to serve more local markets. The County Council argued that this approach is consistent with national guidance and has been accepted in previous Structure Plans. Among the advantages claimed for it are that it enables working to be concentrated on locations that are well related to markets and the transport network, helps to minimise the area subject to disturbance and secure good restoration and after use. Although not followed by other Mineral Planning Authorities (MPAs), the approach is claimed to have been effective in Oxfordshire.

8.7. Against this we found, both in written submissions and in contributions at the EIP, many arguments about the negative effects of the strategic resource area approach. Participants pointed to extensive disruption and major change to the landscape over several decades in the areas involved. The converse to the argument in favour of concentration is that for the areas and communities involved the adverse effects are also concentrated. It is also argued that the other benefits claimed, in terms of transport and the restoration and after use of sites are matters of good practice, and are not dependent on the strategic areas approach. For the industry, although the strategic resource areas offer some certainty and continuity of supply, opinions differ among operators, with some expressing concerns about the inflexibility of the approach.

8.8. In order to take a view on whether strategic resource areas are the best approach, it is necessary to consider the method for selecting them, the soundness of the case for the areas chosen, and the practical consequences in the new development plan system. As the County Council explained, strategic resource areas have been included in successive approved and adopted Structure Plans since 1982, and are historically the areas of the county where sand and gravel working has been concentrated. Apart from the addition of Eynsham to the Cassington and Yarnton area in the current adopted Structure Plan the areas have remained the same. Now, however, the DSP proposes to discontinue two of the previous areas (Sutton Courtenay and Sutton Wick) because they are running out and substitute a new area to meet the requirement in the south of the county.

8.9. The proposals to drop the Sutton Courtenay and Sutton Wick areas and continue with the Lower Windrush Valley and Eynsham – Cassington – Yarnton were

challenged by a number of participants and others. According to the County Council's sand and gravel background information report, these proposals appear to stem largely from considerations of the level of supply. At Sutton Courtenay a decision on a planning application for future working was pending, and mineral operators did not necessarily accept the County Council's proposal to rule it out for the longer term. In the Lower Windrush Valley local communities drew attention to the cumulative impact of large scale mineral working on the area in the past and expressed deep concern about continuing its status as a strategic area, with the implication that a further large proportion of the landscape would be affected. Similar concerns were also raised about the Eynsham – Cassington – Yarnton strategic area.

8.10. We acknowledge the difficulties facing the County Council in deciding where sand and gravel working should take place in the light of the environmental issues to be addressed and the fact that minerals can only be worked where the reserves are. We also recognise that there are good reasons for continuing with working in areas where it has become established. The DSP proposals are based on meeting future requirements from the county by providing up to 7.5mt. from established areas in the Lower Windrush Valley and Eynsham – Cassington – Yarnton, and finding a new strategic area in the south of the county to provide a further 7mt. Beyond the statement in the background information report to this effect, we have no evidence on which to confirm or review the County Council's judgement that this is the best option. Participants have submitted material in support of their objections to the areas chosen, but understandably do not address the alternatives. The Sustainability Appraisal (SA) does not go into the issues in depth. There the only assessment of Policy M2 is in Annex 4 which identifies positive impacts in terms of the benefits of providing a supply of minerals and ensuring restoration of sites, and negative impacts on local landscape, biodiversity and noise and emissions from increased traffic. Such generalisations are of no use whatever in deciding whether the right choice has been made.

Selecting a new strategic resource area

8.11. The identification of a new strategic resource area has been undertaken for the first time in the DSP, and the process for doing this needs to be considered. As described in the background information report, this involved assessing 15 potential resource areas against a number of constraint factors. Key environmental and other designations listed in paragraph 3.4 of the report were regarded as “overriding constraints on mineral working”, and a further 7 constraint factors were applied as follows: accessibility to the main road network; proximity to main market areas; other areas of national archaeological importance (in addition to Scheduled Ancient Monuments); high grade agricultural land; proximity of settlements and the need for buffer zones; aerodrome safeguarding – birdstrike risk; water environment – groundwater, surface water and land liable to flood. Local landscape designations were also identified but not used in the assessment because of their large scale coverage of most of the sand and gravel bearing areas, and because of the general move away from such designations towards a character assessment approach. A final criterion was to consider the estimated quantity of reserves not affected by overriding or other particularly important constraints in relation to the potential requirement for new provision – i.e. whether an area would yield sufficient material.

8.12. On the face of it, these are a rational and justifiable set of criteria, and representations did not generally call for any to be dropped or new ones added to the assessment. Some mineral operators did, however, challenge the restriction of candidate areas to those with a minimum depth of 3 metres of sand and gravel, arguing that shallower depths could provide acceptable and commercially viable extraction. We note the County Council's response that only areas having reserves deeper than 3m would be likely to yield resources on a sufficient scale to form a strategic resource area, although this did not rule out working individual sites of less than this depth. Otherwise the concerns about the selection process were more to do with the judgments made in applying the criteria, and the resultant choice of areas, than about the criteria themselves.

8.13. Participants described the selection process as a "high level sift", although in practice there appear to have been two sifts, the first of which eliminated 8 of the 15 candidate areas followed by a second which, after more detailed consideration, eliminated 5 of the remaining 7 areas. Not surprisingly few of the candidate locations had any supporters among respondents other than mineral operators, but a number queried the basis on which they had been whittled down. Many of the areas, such as Marcham, had been eliminated on the grounds that they would not yield sufficient material to be a strategic mineral working area. There appeared to be a presumption that one new resource area should cover the whole of the additional requirement from southern Oxfordshire. That requirement was itself subject to wide variation, between 1.0mt and 4.7mt, depending on assumptions about the proportion of soft sand to sharp sand and gravel, and about the future level of production from West Oxfordshire. We do not find a conclusive argument for saying that one new area is a better option than two or more – a lot would depend on the respective merits of the areas being considered, and the consequences of higher or lower levels of production within them.

8.14. The final selection was a choice between two areas, with Stadhampton – Berinsfield – Warborough – Benson (SBWB) being preferred to Wallingford – Cholsey – South Moreton (WCSM). This was the subject of several detailed representations and was discussed at the EIP.

Stadhampton – Berinsfield – Warborough – Benson

8.15. The County Council included the SBWB area in the DSP as the new strategic resource area having concluded that it was the best option. It was preferred over WCSM because, although the latter was in some ways less constrained, the concern about birdstrike in relation to RAF Benson pointed against relying on it as a strategic resource area. Many objectors contested this decision. In support of a prospective operator in the WCSM area it was argued that the MOD had not ruled out mineral working in the area, but objected to working of sites close to the airfield and called for "dry" restoration to avoid the risk of increased birdstrike associated with water filled or wetland restoration. Further, a supply of inert fill material in the form of pulverised fuel ash (PFA) from Didcot Power Station would be available for dry restoration, making it unnecessary to rule out the WCSM area. It was also pointed out that the MOD had also raised the birdstrike issue in relation to the eastern part of the SBWB area.

8.16. As regards the SBWB area itself, a number of local objections challenged the basis of its selection. English Heritage maintained that this was one of the most significant areas of archaeological remains in the Thames Valley. While not offering a detailed “ranking” of the candidate areas, EH gave us to understand that SBWB would be far from their first choice for mineral working. Clearly the importance of archaeological assets within this or any other area cannot be known for certain without a detailed assessment, and even then discoveries in the ground may cause any assessment to be reviewed later. There is therefore some risk that, if SBWB is pursued as a strategic resource area, the yield may be compromised by archaeological issues. The County Council argued that the County Archaeologist had confirmed that the SBWB area contains substantial mineral resources that could be worked without affecting archaeological remains of national importance. We have not, however, seen the advice that was given, or what the view was in relation to the other candidate areas.

8.17. One of the arguments to emerge was that, while the County Council had taken as decisive the uncertainty over production levels caused by birdstrike risk and the limited restoration options at WCSM, they had not taken a similar view of the uncertainty caused by the archaeological issues at SBWB.

8.18. To satisfy ourselves conclusively whether SBWB is the right choice would involve reviewing much more extensive evidence than was provided to us, and going into a level of detail inappropriate to a Structure Plan. One might expect the issue to be illuminated by the Sustainability Appraisal (SA) that was done for the Structure Plan. Although the County Council states in paragraph 16 of its written statement for Matter 6 that the sustainability appraisal of the draft Structure Plan supported the inclusion of the SBWB area, this was not included in the published SA document, on which we comment in paragraph 8.10 above.

Practical implications

8.19. The County Council argued that one of the merits of the approach is that it avoids the need for a lengthy, detailed examination of site options across the whole county in preparing the MWDF. For others, however, it is a cause for concern that Policy M2 effectively closes options for more detailed decision making by limiting locations for new sand and gravel working to the three proposed strategic resource areas. Two of those are merely carried forward from previous Structure Plans while the third, SBWB, has been chosen only on the basis of the high level sift noted above. This sits uneasily with the requirement for Strategic Environmental Assessment of new development plan documents, which will apply to the MWDF and will require among other things the appraisal of options.

8.20. In discussion the County Council made it clear that new locations for sand and gravel extraction would not be selected without a full environmental/sustainability appraisal. In future the Core Strategy element of the MWDF would replace the strategic framework of the Structure Plan. In preparing the MWDF the strategic resource areas would need to be reviewed in more detail and if the Structure Plan approach was found to be flawed or the proposed areas not the right ones, then appropriate changes would be made. In the meantime, it was argued, Policy M2 would provide an element of certainty to the industry and to local communities. It is

also clear to us from the discussion, however, that until more specific areas for sand and gravel working have been identified in the MWDF, any proposals for new sites, whether within or outside the strategic resource areas, would need to be considered on their merits, in the light of a detailed assessment.

Conclusions

8.21. We find that the issues of the strategic resource area approach, the process for deciding upon an additional area, the relative merits of the SBWB and other areas and the practical implications pending the preparation of the MWDF are all interconnected. In the light of the discussion above, our conclusions on these issues are:

i) that while strategic resource areas may have suited the county in the past they are not essential to achieving satisfactory decisions. Considerations such as the cumulative impact of working across an area, access to main transport routes, restoration and after management of sites will be fundamental to local minerals planning and implementation whatever high level approach is adopted in the Structure Plan;

ii) that the methodology for selecting a new strategic resource area is at too high a level, and the information presented too superficial, to address fully all the issues that have to be considered before firm decisions could be made;

iii) that there is no certainty that SBWB provides the best option for a new strategic resource area, or that the selection of this area provides a better or more sustainable option than one of the other candidate areas, or dividing the requirement among two or more areas;

iv) that the basis of all the strategic resource areas will inevitably fall to be reviewed in preparing the new MWDF and that in the meantime decisive weight could not be attached to a preference for SBWB over other locations when considering new proposals for mineral extraction.

8.22. Following from the above conclusions, our overall conclusion is that the strategic resource area approach should not be taken forward in the Structure Plan, and that there is not a sound basis for deciding that the three such areas proposed in DSP Policy M2 provide the best and most sustainable options for locating new sand and gravel extraction in the county. We recommend at **R 8.3** that Policy M2 should be revised to delete the naming of strategic resource areas. Instead the Policy should refer to the fact that locations for sand and gravel working will be identified in the new MWDF, and identify criteria for doing this. We have not suggested what these criteria should be. The kind of criteria used in the methodology for identifying a new strategic resource area will be relevant, but it may not be appropriate for the Structure Plan to list them in the way they were set out for that exercise. The methodology will have to have regard to the need for continuity of supply and the advantages of concentration on large areas compared with more dispersed working. Other criteria may also be appropriate, such as the scope that an area offers not only to minimise environmental damage but also to secure gains, for example to biodiversity or resources for recreation. The best approach may be for the Structure Plan merely to

indicate criteria in broad terms, rather than attempt a comprehensive list, which would form part of the methodology for preparing the MWDF.

Recommendations

R8.1 In the final sentence of Policy M1 insert the word “recreation” after the words “nature conservation”.

R8.2 DSP paragraph 11.5 should be revised and updated to reflect the final apportionment figures from the RMS once these are known. Paragraph 11.6 will also need revision, and should include an explanation of how the policy framework for minerals will evolve from the present system of Structure Plan and Minerals and Waste Local Plan to the new arrangements for the Minerals and Waste Development Framework. In general all references to the MWLP should be replaced by appropriate references to the MWDF.

R8.3 Revise Policy M2 to delete the naming of strategic resource areas. Instead the Policy should refer to the fact that locations for sand and gravel working will be identified in the new MWDF, and indicate criteria for doing this.

ANNEX A

GLOSSARY

AONB	Area of Outstanding Natural Beauty
CLA	Country Land and Business Association
CPRE	Campaign for the Protection of Rural England
EDS	Economic Development Strategy
EH	English Heritage
EIA	Environmental Impact Assessment
EIP	Examination in Public
GCR	Geological Conservation Review
GOSE	Government Office for the South East
LDF	Local Development Framework
LTP	Local Transport Plan
MDS	Major Developed Sites in the countryside and usually also in the Green Belt
MOD	Ministry of Defence
MPA	Minerals Planning Authority
MWDF	Minerals and Waste Development Framework
MWLP	Minerals and Waste Local Plan
NHS	National Health Service
NOCL	North Oxfordshire Consortium Ltd
OCC	Oxfordshire County Council
OTCH	Oxford Trust for Contemporary History
OWLS	Oxfordshire Wildlife and Landscape Study
Para	paragraph
PDL	previously developed land
PFA	pulverized fly ash
PMM	plan, monitor and manage
PPG	Planning Policy Guidance note
PPS	Planning Policy Statement
RES	Regional Economic Strategy
RAF/USAF	Royal Air Force/United States Air Force
RIGS	Regionally Important Geological/Geomorphological site
RPG	Regional Planning Guidance
RMS	Regional Minerals Strategy
RSS	Regional Spatial Strategy
RTS	Regional Transport Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SBWB	Stadhampton-Berinsfield-Warborough-Benson
SEEDA	South East England Development Agency
SEERA	South East England Regional Assembly
SPG	Supplementary Planning Guidance
SRA	Strategic Rail Authority
SSSI	Site of Special Scientific Interest
TNR	Transport Network Review
VOWHDC	Vale of White Horse District Council
WODC	West Oxfordshire District Council
WCSM	Wallingford-Cholsey-South Moreton

OXFORDSHIRE STRUCTURE PLAN EXAMINATION IN PUBLIC, OCTOBER 2004

LIST OF EIP MATTERS FOR DISCUSSION AND PARTICIPANTS

MATTER I – GENERAL ISSUES

Do the general policies provide an appropriate framework within which the needs of development and communities in Oxfordshire and concerns for the environment can be met in a way that meet the key requirements of national and regional guidance?

Particular questions to include:

- a) Is it appropriate for the general strategy to seek to meet the development needs of the county within a framework of 'restraining the overall level of development' in the county?
- b) Does the general strategy in Policy G1 address the needs of rural communities?
- c) Is it appropriate for Policy G3 to require infrastructure and service provision to be phased as the development progresses?
- d) Does the Plan provide sufficient guidance on how the Plan will be delivered?

Participants:

Oxfordshire County Council
 Cherwell District Council (1378)
 Oxford City Council (2590)
 Vale of White Horse District Council (1250)
 South Oxfordshire District Council (2634)
 West Oxfordshire District Council (2574)
 GOSE (2568)
 SEERA (2586)
 Oxfordshire Rural Community Council (1301)
 John Philips Planning Consultancy (Merton College) (1720)
 GL Hearn Ltd (Persimmon Homes (Wessex) Ltd) (1763)
 Country Land and Business Association (1411)
 Development Planning & Design Services (Lockinge Estate) (1736)
 House Builders Federation (Southern Region) (2573)
 Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)

Faringdon Chamber of Commerce (2635)
Highways Agency (2585)
Thames Water Utilities (2570)

MATTER 2 - HOUSING

A) HOUSING PROVISION AND OTHER COUNTY-WIDE ISSUES

- i) Is the provision of 37,300 houses appropriate in light of regional guidance and other relevant factors?**
ii) Is the countywide target of at least 55% of new housing on previously developed land appropriate and achievable?

Participants:

Oxfordshire County Council
Cherwell District Council (1378)
Oxford City Council (2590)
Vale of White Horse District Council (1250)
South Oxfordshire District Council (2634)
West Oxfordshire District Council (2574)
GOSE (2568)
SEERA (2586)
Haslams (University of Reading) (1371)
Barton Wilmore Planning (University of Oxford) (2626)
Pegasus Planning Group (Martin Grant Homes) (2617)
House Builders Federation (Southern Region) (2573)
Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)
GL Hearn Ltd (Persimmon Homes (Wessex) Ltd) (1763)
Boyer Planning (Redrow Homes Ltd) (1755)
Thames Water Utilities (2570)

- iii) Is Policy H4 in the Draft Structure Plan appropriate and justified in terms of national and regional planning policy and evidence of housing need in the county and is the target of at least 50% for the county as a whole realistic and achievable?**

Participants:

Oxfordshire County Council

Cherwell District Council (1378)
Oxford City Council (2590)
Vale of White Horse District Council (1250)
South Oxfordshire District Council (2634)
West Oxfordshire District Council (2574)
GOSE (2568)
SEERA (2586)
Oxfordshire Rural Community Council (1301)
Oxfordshire Economic Partnership (1426)
Development Planning & Design Services (Bovis Homes) (1728)
House Builders Federation (Southern Region) (2573)
Thomas Merrifield (C. Dockar Drysdale) (1716)

B) MATTER – HOUSING DISTRIBUTION

Overarching question for each area:

Is the distribution and location of housing, taking into account the County Council's proposed changes to the draft Plan, appropriate in the context of the Plan's overall strategy?

(a) Development within Oxford

Is the amount of housing proposed for Oxford realistic in light of the overall strategy to make the best use of previously developed land and buildings within urban areas while not permitting development on important open spaces?

Participants:

Oxfordshire County Council
Cherwell District Council (1378)
Oxford City Council (2590)
Vale of White Horse District Council (1250)
South Oxfordshire District Council (2634)
West Oxfordshire District Council (2574)
GOSE (2568)
Highways Agency (2585)
Oxford Preservation Trust (1413)
Carter Jonas (Worcester College and Kier Property) (1415)
Darbys Solicitors (St Johns College, Oxford) (1417)
Thames Water Utilities (2570)

(b) Development in Central Oxfordshire

- (i) Is the County Council right in its decision to propose the deletion from Policy HI of an urban extension to Oxford on land south of Grenoble Road?
- (ii) Should the plan propose a revision of the Green Belt boundary to allow more development in Central Oxfordshire, and if so in what general locations?

Participants:

Oxfordshire County Council
 Cherwell District Council (1378)
 Oxford City Council (2590)
 Vale of White Horse District Council (1250)
 South Oxfordshire District Council (2634)
 West Oxfordshire District Council (2574)
 GOSE (2568)
 Highways Agency (2585)
 Horspath Parish Council (2443)
 Baldons Parish Council (1812)
 SPADE (1929)
 Oxford Preservation Trust (1413)
 Pegasus Planning Group (Bride Parks Ltd) (1739)
 FPD Savills (Thames Water & Magdalen College) (1412)
 West Waddy ADP (E.G. Wilcox) (1540)
 Oxford Green Belt Network (88)
 Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)
 Development Planning & Design Services (Bovis Homes) (1728)
 Thomas Merrifield (C. Dockar Drysdale) (1716)
 Lea Investments Ltd (1750)
 Sunningwell Parish Council (1771)
 Barclay Farms (823)
 Stansgate Planning Consultants (Brasenose College) (1744)
 John Phillips Planning Consultancy (Merton College) (1720)

(c) Development at Grove

Is the provision proposed for Grove appropriate in light of environmental, social, economic and other relevant considerations?

Participants:

Oxfordshire County Council
 Cherwell District Council (1378)
 Oxford City Council (2590)
 Vale of White Horse District Council (1250)
 South Oxfordshire District Council (2634)

West Oxfordshire District Council (2574)
 GOSE (2568)
 Highways Agency (2585)
 Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)
 Development Planning & Design Services (Williams FI)(MEPC) (1737)
 Rail Future (364)
 Pegasus Planning Group (Martin Grant Homes Ltd) (2617)
 Grove Parish Council (1795)
 Persimmon Strategic Land (Western) (1762)
 Donald Summers (1341)
 Wantage Town Council
 Woodframpton Ltd (Gallagher Estates & Gleeson Homes Ltd) (2620)
 Thames Water Utilities (2570)

(d) Development at Banbury, Bicester and Upper Heyford

- (i) Is the provision proposed for Banbury and Bicester appropriate in light of environmental, social, economic and other relevant considerations?
- (ii) Does Policy H2 on Upper Heyford provide appropriate strategic guidance for this site?

Participants:

Oxfordshire County Council
 Cherwell District Council (1378)
 Oxford City Council (2590)
 Vale of White Horse District Council (1250)
 South Oxfordshire District Council (2634)
 West Oxfordshire District Council (2574)
 GOSE (2568)
 Highways Agency (2585)
 Boyer Planning (Redrow Homes) (1755)
 Pegasus Planning Group (Taylor Woodrow) (1726)
 Turley Associates (Persimmon Homes (Midlands) Ltd) (1770)
 Chiltern Railways (1359)
 Colin Buchanan & Partners (Lowstrand Properties Ltd) (1746)
 North Oxfordshire Consortium (2625)
 Oxford Trust for Contemporary History (2577)
 Cherwell Valley Parishes (1802)
 Stoneleigh Planning (Hallam Land Management & JJ Gallagher Ltd) (1747)
 Thames Water Utilities (2570)

(e) Development at Didcot

Is the provision proposed for Didcot appropriate in light of environmental, social, economic and other relevant considerations?

Participants:

Oxfordshire County Council
Cherwell District Council (1378)
Oxford City Council (2590)
Vale of White Horse District Council (1250)
South Oxfordshire District Council (2634)
West Oxfordshire District Council (2574)
GOSE (2568)
Highways Agency (2585)
Development Planning & Design Services (Croudace Ltd) (1727)
The Thirteen Parishes Group (2594)
Didcot Town Council (1800)
Campaign for a Sustainable Didcot (2572)
Didcot Development Agency (1410)
Keep Harwell Rural Campaign (2564)
GL Hearn Ltd (Persimmon Homes (Wessex) Ltd) (1763)
RPS (Taylor Woodrow & George Wimpey Plc) (1725)
Haslams (University of Reading) (1371)
Thames Water Utilities (2570)

(f) Development at Witney

Is the provision proposed for Witney appropriate in light of environmental, social, economic and other relevant considerations?

Participants:

Oxfordshire County Council
Oxford City Council (2590)
West Oxfordshire District Council (2574)
GOSE (2568)
Highways Agency (2585)
Thames Water Utilities (2570)
Witney Town Council (1797)
The Witney Society (2560)
Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)
Carter Jonas (The East Witney Land Consortium) (1414)
Barton Wilmore Planning (Oxfordshire Land Ltd) (2628)

(g) Smaller towns and rural areas

Are there more sustainable alternative strategies to that of focusing development to the main urban areas and is the level of housing provision for the rural areas appropriate for each district?

Participants:

Oxfordshire County Council
Cherwell District Council (1378)
Oxford City Council (2590)
Vale of White Horse District Council (1250)
South Oxfordshire District Council (2634)
West Oxfordshire District Council (2574)
GOSE (2568)
Oxfordshire Rural Community Council (1301)
Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)
Faringdon Chamber of Commerce (2635)
Country Land and Business Association (1411)
Wood Frampton (Laing Homes) (1753)
RPS (Banner Homes & George Wimpey PLC & Banner Homes & Gleeson Homes) (1724)
Carterton Fast Forward (1680)
Terence O'Rourke (East of Oxford Consortium) (1743)
Thames Water Utilities (2570)
Broadway Malyan Planning (Kier Land) (1758)

MATTER 3 - ECONOMY

Do the policies provide an appropriate framework to sustain economic prosperity across the county taking into account national and regional guidance and the County Council's overall priorities for the economy?

Particular questions to include:

- a) Does the policy for Oxford (Policy E1) provide the flexibility for appropriate economic development to occur?
- b) Does Policy E2 provide appropriate guidance on the provision of employment land?
- c) Should the Plan contain a specific policy for business clusters and what spatial considerations should such a policy address?

Participants:

Oxfordshire County Council
Cherwell District Council (1378)
Oxford City Council (2590)
Vale of White Horse District Council (1250)
South Oxfordshire District Council (2634)
West Oxfordshire District Council (2574)
GOSE (2568)
SEEDA (3177)
Oxfordshire Rural Community Council (1301)
Oxfordshire Economic Partnership (1426)
Arlington Securities PLC (1429)
Higham & Co (BMW (UK) Manufacturing Ltd) (2636)
Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)
Kemp and Kemp (UKAEA) (1751)
MEPC Milton Park Ltd (1729)
Carterton Fast Forward (1680)
Faringdon Chamber of Commerce (2635)
Highways Agency (2585)
National Farmers Union (South East Region) (464)
Country Land and Business Association (1411)
Oxford Brookes University (2637)
FPD Savills (Magdalen College & Thames Water Property) (1412)
Darbys Solicitors (St John's College, Oxford) (1417)

MATTER 4 – TRANSPORT

Do the transport policies support the Plan's general strategy taking into account Oxfordshire's settlement pattern, the major transport networks and national and regional guidance?

Particular questions to include:

- a) Are the transport policies consistent with national and regional guidance including the regional Transport Strategy?
- b) Are the transport policies consistent with and well integrated with the land use policies, so as to support the proposed pattern for future development?

- c) Does the Plan give adequate guidance on the provision and management of car parking space?
- d) Does the Plan give adequate guidance on the development of public transport?
- e) Does the Plan give adequate guidance on the management and development of the transport networks?

Participants:

Oxfordshire County Council
 Cherwell District Council (1378)
 Oxford City Council (2590)
 Vale of White Horse District Council (1250)
 South Oxfordshire District Council (2634)
 West Oxfordshire District Council (2574)
 GOSE (2568)
 SEERA (2586)
 Highways Agency (2585)
 Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)
 Kemp and Kemp (UKAEA, CCLRC, NRPB & MRC) (1752)
 MEPC Milton Park Ltd (1729)
 Campaign for Sustainable Didcot (2572)
 Didcot Town Council (1800)
 Gosford and Water Eaton Parish Council (477)
 Chiltern Railways (1359)
 Rail Future (364)
 FPD Savills (Thames Water & Magdalen College) (1412)
 Terence O'Rourke (David Tucker Associates) (East of Oxford Consortium) (1743)
 Intermodality (Bride Parks Ltd)(1739)

MATTER 5 – ENVIRONMENT

Do the policies properly reflect national and regional guidance and provide appropriate guidance for the protection, conservation and enhancement of the natural and built environment of Oxfordshire?

Participants:

Oxfordshire County Council
 Cherwell District Council (1378)

Oxford City Council (2590)
 Vale of White Horse District Council (1250)
 West Oxfordshire District Council (2574)
 GOSE (2568)
 Environment Agency (2584)
 Shadow Chilterns Conservation Board (2589)
 Campaign for a Sustainable Didcot (2572)
 English Heritage (2567)
 Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)
 Thames Water Utilities (2570)

MATTER 6 - MINERALS

- (i) Does the Plan make appropriate provision for sand and gravel working in accordance with Government guidance?**
- (ii) Is it appropriate for the Plan to identify strategic locations for sharp sand and gravel working and should the Plan identify a new strategic resource area for sharp sand and gravel working at Stadhampton-Berinsfield-Warborough-Benson?**

Participants:

Oxfordshire County Council
 Vale of White Horse District Council (1250)
 South Oxfordshire District Council (2634)
 West Oxfordshire District Council (2574)
 GOSE (2568)
 Environment Agency (2584)
 TLT Solicitors (Hanson Aggregates) (1702)
 DK Symes Associates (Smith & Sons (Bletchington) Ltd) (1692)
 Lafarge Aggregates Ltd (1375)
 Campaign for the Protection of Rural England (Oxfordshire Branch) (2575)
 PAGE (1684)
 Defence Estates Safeguarding
 Quarry Products Association (2592)
 OUTRAGE (1550)
 English Heritage (2567)

EIP DAILY PROGRAMME**OXFORDSHIRE STRUCTURE PLAN EXAMINATION IN PUBLIC,
OCTOBER 2004**

Week 1		
Day 1	Tuesday 12 October am	Matter 1, General issues (1/2 day)
	Tuesday 12 October pm	Matter 2 (A) (i) & (ii), Housing provision & Previously developed land target (1/2 day)
Day 2	Wednesday 13 October am	Matter 2 (A) (iii), Affordable housing (1/2 day)
		Housing distribution:
	Wednesday 13 October pm	Matter 2 (B) (a), Oxford (1/2 day)
Day 3	Thursday 14 October	Matter 2 (B) (b), Central Oxfordshire (1 day)
Day 4	Friday 15 October am	Matter 2 (B) (c), Grove (1/2 day)

Week 2		
Day 5	Tuesday 19 October am	Matter 2 (B) (d), Banbury, Bicester, Upper Heyford (1/2 day)
	Tuesday 19 October pm	Matter 2 (B) (e), Didcot (1/2 day)
Day 6	Wednesday 20 October am	Matter 2 (B) (f), Witney (1/2 day)
	Wednesday 20 October pm	Matter (B) (g), Smaller towns & rural areas (1/2 day)
Day 7	Thursday 21 October	Matter 3, Economy (1 day)

Week 3		
Day 8	Tuesday 26 October am	Matter 4, Transport (1/2 day)
	Tuesday 26 October pm	Matter 5, Environment (1/2 day)
Day 9	Wednesday 27 October	Matter 6, Minerals (1 day)

**OXFORDSHIRE STRUCTURE PLAN 2016
EXAMINATION IN PUBLIC, OCTOBER 2004****CORE DOCUMENTS****Oxfordshire County Council Documents**

- OCC1: Oxfordshire Structure Plan 2011 (1998)
OCC2: Alteration to the Oxfordshire Structure Plan 2011 (April 2001)
OCC3: Oxfordshire Planning our Future, Review of the Oxfordshire Structure Plan - Issues Paper (April 2002)
OCC4: Oxfordshire Structure Plan 2016 - Deposit Draft (September 2003)
OCC5: Oxfordshire Structure Plan 2016 - Background Information Report (September 2003)
OCC6: Oxfordshire Structure Plan 2016 - Housing Potential Report (September 2003)
OCC7: Oxfordshire Structure Plan 2016 - Feasibility Report (September 2003)
OCC8: Oxfordshire Structure Plan 2016 - Sustainability Appraisal (September 2003)
OCC9: Oxfordshire Structure Plan 2016 - Sand & Gravel Background Information Rept (Sept. 2003)
OCC10: Oxfordshire Structure Plan 2016 - Statement of Pre-Deposit Publicity & Consultation (September 2003)
OCC11: Oxfordshire Structure Plan 2016 - Proposed Pre-EIP Changes to the Deposit Draft Plan (April 2004)
OCC12: Oxfordshire Biodiversity Action Plan (July 1998)
OCC13: Oxfordshire Economic Development Strategy (2001-2005), Oxfordshire Economic Partnership (December 2001)
OCC14: Oxfordshire Local Transport Plan 2001-2006
OCC15: Local Transport Plan Annual Progress Report for 2001
OCC16: Local Transport Plan Annual Progress Report for 2002
OCC17: Local Transport Plan Annual Progress Report for 2003
OCC18: Oxfordshire Minerals & Waste Local Plan 1996-2006
OCC19: Oxfordshire Plan 2003-2004
OCC20: Oxfordshire Community Partnership Community Strategy 2004-2007 (July 2004)
OCC21: Oxfordshire Walking Strategy (August 2001)
OCC22: Oxfordshire Cycle Strategy (August 2001)
OCC23: A Cultural Strategy for Oxfordshire 2001-2006
OCC24: Home Zone Characteristics for New Housing Developments (2002)
OCC25: Infrastructure and Service needs for New Development – The approach to planning obligations and agreements for development in Oxfordshire (2002)
OCC26: Mapping Poverty in Oxfordshire (2000)
OCC27: Quality of Life Indicators (2003)
OCC28: Affordable Housing – A Picture of Oxfordshire (2003)
OCC 29: Interim Report to SEERA, “Central Oxfordshire Sub-Regional Strategy”
OCC 30: “Oxfordshire Structure Plan, Proposed Alterations No 4”, Examination in Public March 1991
OCC 31 Reports to the Environmental Committee “Proposed Alteration to the Oxfordshire Structure Plan 2011, Direction of Growth at Didcot”
OCC 32 “Travel to Work in Oxfordshire, Comparisons Between 1991 and 2001” August 2004
OCC 33 Map, “Oxfordshire Green Belt Area”, *photocopies not available: protected by OS Copyright.*
OCC 34 Report and Minutes by the Head of Sustainable Development to the Executive 20 July 2004 “UK Sustainable Development Strategy”.
OCC 35 1)Report, 2)Minute and 3)Decision Sheet of Head of Sustainable Development to The Executive, 19 October 2004 “Regional Planning Central Oxfordshire Sub –Regional Strategy and Other Sub-Regional Strategies Affecting Oxfordshire”.
OCC 36 In relation to the above, a submission to SEERA 20 October “South East Plan / Central Oxfordshire Sub Regional Strategy”
OCC 37 Report and Minute of the Head of Transport to the Executive 6 July 2004 “Cross Thames Travel”

Local Plan Documents

Documents

LP1: Cherwell Local Plan 2011 (Adopted1996)
LP2: Cherwell Local Plan 2011 Deposit Draft (February 2001)
LP3: Cherwell Local Plan 2011 Revised Deposit Draft (September 2002)
LP4: Oxford City Local Plan 2001 (Adopted1991)
LP6: Oxford City Local Plan 2016 *first* Deposit Draft (June 2002)
LP7: Oxford City Local Plan 2016 *second* Deposit Draft (February 2003)
LP8: South Oxfordshire Local Plan 2011 (Adopted1997)
LP9: South Oxfordshire Local Plan 2011 Deposit Draft (June 2002)
LP10: South Oxfordshire Local Plan 2011 Deposit Draft (September 2003)
LP11: Vale of White Horse Local Plan 2011 (Adopted1999)
LP12: Vale of White Horse Local Plan 2011 Deposit Draft (November 2002)
LP13: Vale of White Horse Local Plan 2011 Second Deposit Draft (June 2004)
LP14: West Oxfordshire Local Plan 2011 (Adopted1997)
LP15: West Oxfordshire Local Plan 2011 Deposit Draft (September 2001)
LP16: West Oxfordshire Local Plan 2011 Revised Deposit Draft (February 2003)
LP 17 “Oxford’s Housing Viability Study” main Report April 2004

Government Documents

GOV1: PPG1 - General Policies and Principles (1997)
GOV2: PPG2 - Green Belts (1995)
GOV3: PPG3 - Housing (2000)
GOV4: PPG4 - Industrial and Commercial Development and Small Firms (1992)
GOV5: PPG6 - Town Centres and Retail Developments (1996)
GOV6: PPG7 - The Countryside – Environmental Quality and Economic and Social Development (1997)
GOV7: PPG8 - Telecommunications (2001)
GOV8: PPG9 - Nature Conservation (1994)
GOV9: PPG10 - Planning and Waste Management (1997)
GOV10: PPG11 - Regional Planning (2000)
GOV11: PPG12 - Development Plans (1999)
GOV12: PPG13 - Transport (2001)
GOV13: PPG14 - Development on Unstable Land (1990)
GOV14: PPG15 - Planning and the Historic Environment (1994)
GOV15: PPG16 - Archaeology and Planning (1990)
GOV16: PPG17 - Planning for Open Space, Sport and Recreation (2002)
GOV17: PPG20 - Coastal Planning (1992)
GOV18: PPG21 - Tourism (1992)
GOV19: PPG22 - Renewable Energy (1993)
GOV20: PPG23 - Planning and Pollution Control (1994)
GOV21: PPG24 - Planning and Noise (1994)
GOV22: PPG25 - Development and Flood Risk (2001)
GOV23: RPG9 - Regional Planning Guidance for the South East (2001)
GOV24: MPG6 - Minerals Planning Guidance: Guidelines for Aggregates Provision in England (April 1994)
GOV25: Planning and Compulsory Purchase Bill (December 2002)
GOV26: Planning for Sustainable Development, Towards Better Practice (October 1998)
GOV27: “A Better Quality of Life” Strategy for Sustainable Development for the UK, ODPM (2003)
GOV28: Circular 6/98 – Planning and Affordable Housing, DETR (1998)
GOV29: Circular 1/97 – Planning Obligations, DETR (1997)
GOV30: Circular 4/02 - Control of Development affecting Trunk Roads and Agreements with developers under Section 278 of the Highways Act (1980)
GOV31: Planning to Deliver: The Managed Release of Housing Sites, DETR (July 2001)
GOV32: Tapping the Potential–Assessing Urban Housing Capacity: Towards Better Practice, DETR, Dec 2000
GOV33: Monitoring the Provision of Housing, DETR (Oct 2000)
GOV34: Structure Plans – A Guide to Procedures, DETR (1999)
GOV35: Countryside and Rights of Way Act 2000
GOV36: Our Energy Future – Creating a Low Carbon Economy, DTI (2003)
GOV37: The Environment Act (1995)
GOV38: Biodiversity - The UK Action Plan, HMSO (1994)

Documents

GOV39: National & Regional Guidelines for Aggregates Provision in England 2001-2016, ODPM (2003)
GOV40 Waste Strategy 2000 for England and Wales, DETR (2000)
GOV41: PPS22 Planning Policy Statement 22: Renewable Energy
GOV42: PPS7 Planning Policy Statement 7: Sustainable Development in Rural Areas
GOV 43 Highways Agency Babbie "A34 Route Management Study" October 2003
GOV 44 "Housing & Planning in the Regions: Consultation Paper" Office of the Deputy Prime Minister 2004
GOV 45 Planning Consultation Documents (3) PPS 9 "Biodiversity and Geological Conservation PPS 11
"Regional Spatial Strategies" and PPS 12 "Local Development Frameworks" published by Office of the
Deputy Prime Minister.
GOV 46 "Alterations to the Structure Plan for Oxfordshire" April 1987

Regional Documents

REG1: Development of a Renewable Energy Assessment and Targets for The South East GOSE (2001)
REG2: 2002 Regional Housing Statement. GOSE/Housing Corporation South East
REG5: Draft Regional Economic Strategy, SEERA (Sept 2002)
REG6: "From Crisis to Cutting Edge" Draft Regional Transport Strategy, SEERA (January 2003)
REG7: Regional Economic Strategy 2002 – 2005, SEEDA (December 2002)
REG8: 'No Time to Waste' Regional Waste Management Strategy Consultation Draft, SEERA (2003)
REG9: 'Harnessing the Elements' Proposed Alterations to Regional Planning
Guidance on Energy Efficiency and Renewable Energy (2003)
REG10: SEERA Waste Strategy for England and Wales, DETR (2000)
REG11: SERP 160: A Sustainable Waste Planning Strategy for the South East, SERPLAN (1997)
REG12: Aggregates Apportionment: The Sub-Regional Apportionment of the Regional Sand and Gravel
Requirement in MPG6, RPC2705, SERPLAN (December 1994)
REG13: Regional Minerals Strategy, Consultation Draft, SEERA (September 2003)
REG14: Proposed Alterations to Regional Planning Guidance South East – Regional Minerals Strategy March
2004
REG15: Proposed Alterations to Regional Planning Guidance South East – Regional Waste Management
Strategy
REG 16: GOSE "Population and Household Projections" and "Planning Reform Timetable" Received 8
October 2008
REG 17: "South East Plan, Spring Debates" Discussion Papers 2004
REG 18 "South East Regional Housing Strategy 2004/05 – 2005/06" GOSE 31 July 2004
REG 19 South West Regional Assembly, RSSSG Meeting 20 January 2004, "Moving Forward Regional
Components of RSS".
REG 20 SEERA "Central Oxfordshire Sub-Regional Study" April 2004
REG 21 SEERA "The Western Corridor Sub-Regional Study April 2004
REG 22 GOSE: Submission of Information requested by Panel Chairman at Preliminary Meeting 1 September
2004 on Issues Relevant to the EIP Discussions
REG 23 GOSE "Proposed Alterations To RPG South East Regional Transport Strategy – Publication of Panel
Report" 9 October 2003.

Other Documents

OD1: Thames Environment – The Environment Strategy for Land Use Planning in the Thames Region,
Environment Agency (March 1998)
OD2: Enterprising Oxford, The Growth of the Oxfordshire High-tech Economy, Oxford Brookes University
(2003)
OD3: Council Directive 9/3/EC on the Landfill of Waste, European Community (1999)
OD 4: reports by Oxfordshire District Councils, Urban Housing Capacity Studies.
OD 5: Appeal, Consortium Developments Ltd v SODC. 1988/89
OD 6: Appeal, North Oxfordshire Consortium Ltd & North Oxfordshire Consortium (Land Developments) Ltd.
v Cherwell DC
OD 7 Publication by National Housing Federation, South East "The Evidence Update 2004: Key Facts About
Housing and Housing Associations in the South East of England". Submitted by Vale of White Horse in the
course of the EIP.

Core

Documents

- OD 8 Submission by Barton Willmore Planning to the EIP, re Recommendations of the Inspector relating to the 2002 appeal inquiry into the proposed development at the former RAF Upper Heyford.
- OD 9 Submission by FPD Savills to the EIP. Four documents: -
“Affordability and Access to Home Ownership in Oxfordshire”
“Sense of Place”
“Oxford STW Relocation” Thames Water 2004
“Development Around Oxford, Environmental and Landscape Considerations” FPCR 2004.
- OD 10 Route Maps (2) EIP Panel Tour *photocopies not available, protected by OS Copyright*
- OD 11 Contributions from Mr WG Wooster to EIP re. “Development at Grove”.
- OD 12 Contribution from Dr FW Wright, Eynsham “Eynsham Village Design Statement” (2004) in connection with matter 6 “Minerals”
- OD 13 Vale of White Horse District Council Minutes of a Special Meeting of the Executive 13 October 2004 :
a) Emerging Central Oxfordshire Sub-Regional Strategy b) Emerging Didcot Integrated Transport Strategy
- OD 14 Submission from FPD Savills 18 October 2004 “The Oxford Green Belt,” a study for the Oxford Preservation Trust.
- OD 15 Covering letter dated 20 October 2004 and report by Intermodality submitted to the EIP Panel concerning proposed rail stations at Kidlington and Shipton Quarry
- OD 16 “Economic Study of Oxford”. Final report, dated July 2004 to Oxford City Council by SQW Limited and Cambridge Econometrics
- OD 17 Report from the Environment Agency to the County Council 6 February 2004 “Oxfordshire Structure Plan, Grove”
- OD 18 Response from the Environment Agency to EIP Panel regarding flood risk at Grove (letter dated 19 October 2004)
- 28 October 2004