

## **South Oxfordshire Local Plan 2011-2034**

### **Inspectors' initial questions**

This set of questions deals with the spatial strategy and with strategic housing and employment issues only. Questions and comments concerning specific site allocation policies and development management policies will be issued separately.

These questions are about fundamental aspects of the plan, so we would be grateful if the Council could provide detailed and carefully explained answers to assist us, pointing to, and using extracts from, key background documents where appropriate.

#### *STRAT1: The Overall Strategy*

1. Paragraph 68 of the NPPF indicates that local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than 1 ha. Please can the Council provide evidence to indicate that such land has been identified.
2. In terms of the overall number of homes on allocated sites, what proportion of the total are proposed to be delivered on Green Belt sites?
3. Paragraph 137 of the NPPF states that the authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. We have read the Spatial Strategy and Site Selection Topic Papers, but please can the Council set out for the Examination a clear explanation of why it has preferred to allocate housing sites within the Green Belt when it is being argued that there are available sites outside the Green Belt.
4. In addition, please can the Council set out why in spatial strategy terms it has selected some strategic sites which are some distance from the main urban areas and which require significant infrastructure investment, when it is being argued that there are well-located sites which are adjacent to the main urban areas.
5. Would greater sustainability and social integration be achieved, with less infrastructure cost, and faster delivery, by focusing growth within and adjacent to the established towns of Didcot, Thame, Wallingford and Henley?
6. Is there an over-emphasis on locating sites in relation to Oxford compared with other major urban areas including Reading?

#### *STRAT2: South Oxfordshire Housing and Employment Requirements*

This will be a topic at the hearings and the issue of Oxford's own capacity will be dealt with in the hearings for the Oxford Local Plan. However, we would like a number of points clarified at this stage.

7. Please can the Council confirm whether the following is a correct summary of its position, which we have taken from the Housing Topic Paper and the explanatory text in the Plan itself:

- (a) The standard method based on 2014 household projections points to a starting point for housing need in South Oxfordshire of 627 dwellings per annum. (Housing Topic Paper 2.27 and 2.28)
- (b) To plan for the Growth Deal commitment of 100,000 homes, 21,761 dwellings would be required between 2011 and 2031, which is arrived at by subtracting 78,239 committed homes from other authorities, including 9,690 from Oxford itself, from the 100,000 total. (Housing Topic Paper 2.28(a))
- (c) This, plus previous delivery trends suggest that the figure should be raised to 775 dpa, or 17,825 homes between 2011 and 2034. (Housing Topic Paper 2.29)
- (d) Oxford's housing need from the standard method is 806 homes a year, or 16,120 homes between 2011 and 2031. The Oxfordshire authorities have agreed a capacity of the city of 10,000 homes for this period, which would result in an unmet need of 6,120 homes. Collectively, these authorities provided / are proposing an additional 9,350 homes to address the City's needs. Consequently, addressing unmet need from the City would not on its own justify an uplift in the housing need for South Oxfordshire. (Housing Topic Paper 2.28(c))
- (e) But an additional uplift should be made for Oxford's unmet need; taking the housing provision in the other three districts' plans, an additional 4,950 dwellings are needed in the South Oxfordshire Local Plan to meet Oxford's need in addition to a residual 2,099 dwellings; so 7,049 additional new homes need to be planned for. (Plan 4.32 and Housing Topic Paper 2.34)
- (f) The 2014 SHMA is modelled in 2011-based interim household projections and is not a recent assessment of housing need so it does not justify an increase in housing need on its own. (Housing Topic Paper 2.28(e))
- (g) However, the Council's commitment to the Growth Deal, which was based on the housing numbers in the 2014 SHMA (ie 2011-based interim projections), justifies an increase to 775 dpa (Topic Paper 2.29(e)).

Please can the Council help us to understand various points arising from the above. In particular:

- 8. We would like to understand how the figure of 21,761 dwellings in (b) and previous delivery trends in (c) leads from 627 dpa to the figure of 775 dpa or 17,825 homes in (c).
- 9. Please can the Council confirm that the housing requirement under STRAT2(2) is a stepped trajectory that amounts to 775 dwellings per annum from 1 April 2011 to 31 March 2021, as indicated in (c), and 1,270 dpa from 1 April 2021 to 31 March 2031, arising from (e).
- 10. Please can you explain why this additional uplift is necessary, as indicated by (e), if Oxford's unmet need has been addressed as described in (d)?
- 11. The Council has discounted the 2014 SHMA as being out of date in item (f) so we would like further explanation to understand how the conclusion in (g) is supported, in the light of the Council's statement that the figures for the Growth Deal are derived from the same source.

12. If the SHMA is out of date, has the Council taken any decision whether or not to re-visit it (as Oxford City has) and what was the reason for that decision?

*The housing trajectory and 5 year housing land supply*

13. The housing trajectory is set out in graph form in Appendix 8 of the submitted Plan, but please can the Council provide the latest evidence in tabular form showing the anticipated numerical input from all sources including individual allocated sites over the plan period. This should be provided in a form that will enable us to see the expected lead-in times and delivery rates of the strategic allocations and other large sites, taking into account the timing of the key infrastructure projects.
14. What level of housing do the Council expect to deliver over the plan period (as opposed to the housing requirement)? What is the size of the headroom that would be available to ensure the flexibility and robustness of the plan?
15. In due course we will want to see a chart that demonstrates that a rolling 5 year housing land supply will be maintained from the anticipated date of the Plan's adoption. This should take into account the Plan's requirement for 1,270 dpa from 1 April 2021.

*Housing density*

16. Apart from the illustrations in Appendix 2 to the Housing Topic Paper, please will the Council provide appropriate analysis, across the full range of types of settlement and localities, to demonstrate that the prescriptive density requirements in STRAT5 ("Proposals for major development must achieve the following minimum net densities") will protect and/or enhance local character?
17. How can the densities sought in STRAT5 be reconciled with Policy DES2, which seeks to enhance local character?
18. How can the densities sought in STRAT5 be reconciled with Policy H11, Housing Mix, in which a proportion of future households will need larger homes with family-sized gardens?
19. Is the plan dependent on attaining these minimum densities on all major development sites in order to achieve its housing requirement?

*Employment land provision*

20. Does the plan make sufficient provision for employment growth given the arguments raised in a number of representations that the stock of land is not meeting the needs of local employers as well as failing to provide for growth arising from businesses wishing to move into the area?

## South Oxfordshire Local Plan

### Inspectors' initial questions and comments: Part 2

Our previous questions addressed the Plan's spatial strategy, together with the provision of land for housing and employment. This second set of questions deals with a range of other policies for the management of development. In due course we will produce a third set which will address site allocations and infrastructure provision.

#### Housing Policies

##### **H1: Delivering new Homes**

##### **H16: Infill development and redevelopment**

These policies are inconsistent with each other and create confusion through the use of the term "infill development" and "infilling". The table in Policy H16 is also very prescriptive. Both policies are ineffective.

We believe the plan ought to allow *development* (not "*infilling*") within the built up areas of towns and larger villages, and should say so clearly and without compromise. It is not necessary to refer to infill development, which is described as the filling of a small gap; this is not relevant to development in the built up areas of towns and larger villages. It is not necessary to refer to any other plan policies; the plan must be read as a whole and any proposal would obviously be subject to other plan policies, which would protect, for example, important open spaces and heritage assets and require high quality development.

When it comes to the smaller villages and other villages, the policies could state that, where it is important to maintain local character, development will be limited to infilling and brownfield sites, but we do not think a table of infill site sizes is helpful or effective because villages and suitable development sites vary widely in character and in any case Policy DES1 protects local character.

Please will the Council produce revised versions of Policies H1 and H16 for our consideration.

##### **H8: Housing in the Smaller Villages**

Part 2 refers to a 5% to 10% level of growth in dwelling numbers to be achieved through neighbourhood plans. Please can the Council explain the background to this figure.

##### **H9: Affordable Housing**

Do the terms of Policy H9 allow for at least 10% of the homes on major development to be available for affordable home ownership as indicated by paragraph 64 of the NPPF?

It is unclear whether retirement villages or Class C2 housing is expected to deliver affordable housing under this Policy. Please can the Council clarify the approach towards these forms of development.

##### **H10: Exception Sites**

The wording of Part 1 should not say "in exceptional circumstances", since the policy itself sets out the circumstances under which such development will be permitted. Nor should it say "may" be permitted, for the same reason; *may* implies that other hidden criteria or factors that could be employed to judge a scheme, whereas the plan's criteria must be explicitly stated.

The policy should not refer to sites within villages, for two reasons; firstly, the development could equally be related to a town; and secondly, development is acceptable within towns and villages in any case. Exception sites are normally outside settlements – they are exceptions to policies of countryside restraint for which planning permission would not normally be granted. Consequently, we suggest the following wording: *“1. Small-scale affordable housing schemes will be permitted in rural areas outside settlements, provided that:.....”*

Does the plan provide adequately for entry level exception sites suitable for first time buyers or those looking to rent their first home, as sought by paragraph 71 of the NPPF? How would they be facilitated under Policy H10, or is additional wording required?

### **H11: Housing Mix**

Parts 3 & 4: Proposed modification 45 concerning Policy CSD13 correctly removes the need for market housing to deliver a proportion of wheelchair accessible dwellings, in order to be consistent with the NPPF. However, it leaves an inconsistency, because Part 3 still says that at least 5% of affordable homes should be designed as wheelchair accessible whereas in Part 4 only 3% of affordable homes on sites of 100+ dwellings need be.

Part 5: Is there a justified explanation for applying the Nationally Described Space Standards to all AH and 1 & 2 bed market dwellings?

Part 6: The requirement for the housing mix in all developments to “be in general conformity with the Council’s latest evidence” is unacceptable because that evidence will change over time and is not before the Examination, nor is any contrary evidence from developers. We suggest changing the wording to Part 6 to “have regard to the Council’s latest evidence etc” and that this wording be transferred into the explanatory text rather than remaining in the Policy.

### **H12: Self-Build and Custom Housing**

NPPF paragraph 61 states that the size, type and tenure of housing for different groups in the community, including people wishing to commission or build their own homes, should be assessed and reflected in planning policies. Does the Council have evidence of demand for self- build/custom housing on strategic allocations or would such housing be better met elsewhere, for instance on individual, small and medium sized sites?

### **H13: Specialist Housing for Older People**

This policy is ineffective.

Firstly, and very importantly, it does not allow for private sector developers or operators in this field to bring forward suitable sites for this type of housing.

Secondly, the first part of the policy is only a statement of intent that the Council will identify locations, which is insufficient. It is not clear when such a site identification process would take place or how it would be brought to bear on the planning process.

Thirdly, it does not adequately identify or promote the variety of different forms of development that come under this heading, including retirement villages, sheltered accommodation, extra care housing, nursing/care homes and others.

Finally, given the evidence of current and future need for this form of development and the issues involved in identifying and allocating housing land, have the Council considered whether there is a case for some form of exception policy?

**H14: Provision for Gypsies, Travellers and Travelling Showpeople**

Please can the Council confirm that Part 2 of the policy refers to sites other than those to be provided under Part 1. If that is the case, the policy should make this clear.

**H16: Infill Development and Redevelopment**

This policy is ineffective for a number of reasons which are discussed above in relation to Policy H1. Please will the Council provide a new form of wording for both policies.

**H17: Sub-division and Conversion to Multiple Occupation**

This policy is inconsistent with national policy because it refers to sub-division and conversion to multiple occupation only within built-up areas, whereas NPPF paragraph 79 (d) allows subdivision of existing residential dwellings in the countryside. This inconsistency should be rectified by deleting “within the built-up areas of the towns and villages (as set out in Appendix 7)” from the Policy.

**H18: Replacement Dwellings**

Part 1 iii) is inappropriate since it adds an additional policy requirement in respect of the demolition of unlisted buildings that does not exist in national policy, and is arbitrary and not properly defined compared to the rigorous approach to listed buildings and undesignated heritage assets. The protection of heritage assets is covered by Policies ENV6 and ENV7 and there are other policies in the plan to encourage good design and protect local character and distinctiveness. This part of the policy should be deleted.

**H19: Re-use of rural buildings**

NPPF paragraph 79 c) states that the re-use of redundant or disused buildings is an exception to the restriction of developing isolated homes in the countryside. But this exception does not refer to a sequential process whereby residential re-use would only be acceptable once an employment use has been found to be unacceptable. It appears that the Policy is therefore contrary to national policy and it needs to be re-written to reflect the NPPF.

**H21: Extensions to Dwellings**

Part 1 i) doesn't make sense and should be re-written to incorporate the exact wording in NPPF paragraph 145 c).

Parts ii) and iii) refer to the Oxfordshire County Council parking standards and the South Oxfordshire Design Guide respectively, requiring that development accord with these documents. But they have not been examined and are not being examined here and the policy should therefore be re-phrased to indicate that development should “have regard” to these documents rather than accord with them.

**Employment Policies**

**EMP3: Retention of Employment Land**

This policy needs to be re-written for the following reasons.

- If an employment site is not viable and has been appropriately marketed with no success, then it should not also be subject to a further test that the change of use will not lower the employment capacity below “that estimated to be necessary” since this will lead to prolonged vacancy and a failure to make the best use of land (Part 1, third bullet point).

- In addition, “the Council agrees”, “where the Council is satisfied” and “to the satisfaction of the Council” need to be removed since these provide no objective assessment criteria and in any case the proposal could be determined at appeal.
- A further point is that Part 1 defines the criteria for the circumstances under which employment land could be lost, but Point 3 then seems to set out another criterion which does not fall within the circumstances set out in Part 1. Part 3 should be an integral part of Part 1.

**EMP8: New Employment Land at Crowmarsh Gifford**

If the Crowmarsh Gifford Neighbourhood Plan has been made there is no need for this Policy. If it hasn't and is unlikely to be before the Local Plan is adopted, the first sentence of Part 2 should be deleted, because the Local Plan is incapable of ensuring that it is submitted within 12 months of the adoption of the local Plan. The Policy would be ineffective if it contained this sentence.

**EMP10: Community Employment Plans**

It is not the purpose of the planning system to interfere with business procurement or the sourcing of local produce, suppliers and services. This is contrary to the NPPF which seeks to encourage economic growth and is in effect anti-competitive and has the potential to increase business costs.

**EMP11: Development in the Countryside and Rural Areas**

The reference to within the built-up areas of towns in Part 1 i) is inappropriate in a Policy that focuses on the countryside and rural areas and should be deleted accordingly, in order to comply with NPPF paragraph 83 a).

**EMP14: Retention of Visitor Accommodation**

Bullet Point 2 is not appropriate and is ineffective because if the business is no longer viable and alternative visitor accommodation has been fully explored then the additional test (adverse impact on the tourism industry, local community and economy) is unnecessary and if invoked could result in prolonged vacancy since by definition no other visitor accommodation would be suitable.

**Natural and Historic Environment Policies**

**ENV1: Landscape and Countryside**

The second sentence of Part 2 refers to “valued” landscapes. In order to avoid confusion with the meaning of that term in NPPF paragraph 170 a), this word should be removed.

The reference to the definition of hedgerows within the Hedgerow Regulations is too prescriptive and inappropriate since the aim is to retain hedgerows in general. Consequently, the reference to the Regulations' definition should be removed.

**ENV4: Watercourses**

In Part 2 it is unclear why a minimum 10m buffer zone along both sides of all watercourses no matter what their size is required when the Environment Agency requires no more than an 8m buffer zone along main rivers. What is the justification for this?

Should the policy contain an exception clause to enable development to take place with a smaller buffer zone where it would fulfil other important planning objectives?

It appears disproportionate to require a construction management plan for any development that is located within 20m of any watercourse. This part of the policy needs to be reconsidered to ensure that it is proportionate.

**ENV5: Green Infrastructure in New Developments**

Some of the documents referred to in parts 2 and 3 of the policy (Green Infrastructure Strategy, Didcot Garden Town Delivery Plan) are not development plan documents, and they have not been examined. It is therefore inappropriate for the policy to require conformity with their quality standards or with their requirements for additional provision. Rather, the policy should say that development should “have regard to” these documents in the supporting text to this Policy. Made Neighbourhood Development Plans are part of the development plan and do not need to be referred to.

**ENV6: Historic Environment**

**ENV7: Listed Buildings**

**ENV8: Conservation Areas**

Parts 1 and 3 of Policy ENV6 are simply statements of intent by the Council and do not belong in a development plan policy. They should be taken out and inserted into the supporting text, as they are simply background.

Part 2 of Policy ENV6 mixes up heritage assets and local distinctiveness. It also addresses subjects that are also included in Policy ENV7 and ENV8.

Part 2 of Policy ENV7 does not follow the NPPF – it appears to allow for demolition in “exceptional circumstances” and the mitigation of harm. Neither of these expressions are in paragraph 195 of the NPPF. In addition, the policy does not include the criteria at NPPF 195 (a) to (d). There is no section on less than substantial harm, as indicated in paragraph 196 of the NPPF.

In addition, Policy ENV7 deals with listed buildings but the plan does not appear to deal adequately with non-designated heritage assets except briefly in Policy ENV6.

In Policy ENV8, the reference to the South Oxfordshire Design Guide in Part 1 iii) should say “have regard to” rather than “in accordance with” for the reasons already stated above.

Policy ENV6 should be deleted, and policies ENV7 and ENV8 should be re-written to follow the wording of the NPPF and to reflect the legal Duty.

**EP1: Air Quality**

Bullet point 1 should say that development should “*have regard to*” the Council’s Developer Guidance Documents and the associated Air Quality Action Plan rather than “be compliant with” them because these documents have not been and are not now the subject of examination.

**EP5: Minerals Safeguarding Areas**

This Policy appears to attach more weight to the importance of extracting minerals than, for example, residential development. It is unclear to what extent this Policy will delay development and why, for instance, residential development is not more important than mineral extraction. Can the Council please explain the reasoning behind this Policy and its likely impact on other needed development?

## **Design Policies**

### **DES1: Delivering High Quality Development**

In part 2, a “constraints and opportunities plan and design rationale” is unnecessary because Policy DES3 requires a proportionate Design and Access Statement, as required by law. The requirement for this should be deleted.

In part 3, it is inappropriate to require development to accord with the South Oxfordshire Design Guide since that document is not a development plan document and has not been examined. Either the design objectives should be set out in the Policy or the point should be deleted and the supporting text should say that development should “*have regard to*” the design objectives in the Design Guide.

### **DES7: Public Art**

The NPPF does not seek public art per se; rather it seeks the creation of high quality buildings and spaces. Whilst public art might form an element of this, it is not an essential component of good design; the cost of commissioning art might be better spent on other design aspects. Consequently, the requirements in the Policy for public art on all major development or development on sites larger than 0.5 hectares is unnecessarily prescriptive and ineffective as written and should be deleted. It would instead be appropriate for the supporting text of this chapter to express encouragement towards the provision of public art on larger development schemes, having due regard to the guidance on this matter in the South Oxfordshire Design Guide.

### **DES8: Efficient Use of Resources**

In part 1 i), it is not clear whether “taking account of local circumstances” would allow a reduction below 30dph, or whether there is no scope to do so. Please can the Council explain the intention of this part of the policy. We are of the view that local circumstances are very likely to require lower densities in some localities to avoid harming their character.

In addition, it is not clear why the density requirement is duplicated here – it is set out in Policy STRAT5, whose density requirements appear to be different (35dph minimum).

### **DES9: Promoting Sustainable Design**

The latest NPPF contains different wording from that set out in part 3 of this policy. NPPF paragraph 131 says that great weight should be given to innovative designs which promote high levels of sustainability so long as they fit in with the overall form and layout of their surroundings. The wording of Part 3 should be replaced by the wording from paragraph 131.

## **Community Facilities Policies**

### **CF5: Open Space, Sport and Recreation in New residential Development**

Part 1: Reference to “In line with” the most up to date standards set out in the open Space Study should be replaced by “*having regard to*” for the reasons given above.



## **Inspectors' comments on the Council's "Schedule of Modifications"** **(Document CSD13).**

These are our comments on Document CSD13, which contains the Council's suggested list of modifications arising from Regulation 19 consultation. It is important to note that these do not constitute our list of recommended modifications. Our comments are without prejudice to any further comments and recommendations that we may make about the soundness of the policies themselves.

When it comes to producing a schedule of modifications for consultation, it will be important for the Council to distinguish minor modifications, which do not alter the effect of the policies and can be inserted at the Council's discretion without Inspector recommendation, and main modifications, which require Inspector recommendation and public consultation.

### **MINOR MODIFICATIONS**

The following modifications suggested by the Council amount to minor modifications. They do not have any bearing on the effect of the policies and can be inserted at the Council's discretion without the need for an Inspector recommendation:

1-7, 9, 12, 14, 19, 26-28, 33, 34, 36, 37, 39-44, 47, 52-54, 60-75.

### **MAIN MODIFICATIONS THAT APPEAR ACCEPTABLE AND NECESSARY FOR SOUNDESS OR EFFECTIVENESS**

The following modifications put forward by the Council would amount to main modifications. It appears to us at this stage that they may be justified for soundness and effectiveness, but they will need to be included in the schedule of main modifications in due course and will be subject to public consultation along with all other main modifications that emerge during the examination process. This is subject of course to any other recommendations we may make about the policies themselves during the course of the examination.

13 (STRAT9), 17 (STRAT10), 20 (STRAT11), 21 (STRAT11), 22 (STRAT11), 23 (STRAT12), 24 (STRAT12), 30 (STRAT13), 31 (STRAT14), 32 (STRAT14), 35 (H2), 38 (H3), 48 (H19), 49 (TRANS1a), 55 (ENV10), 56 (ENV10), 57 (ENV10), 58 (ENV10).

In the case of 35 and 38 the wording should reflect the terms of any extant planning permission.

### **MAIN MODIFICATIONS THAT CANNOT BE RECOMMENDED IN THE FORM PUT FORWARD BY THE COUNCIL AND REQUIRE RECONSIDERATION**

The following modifications suggested by the Council would amount to main modifications but are not acceptable as they stand and require reconsideration.

10. (STRAT7) This is a proposed modification to STRAT7 rather than STRAT6 as indicated in the schedule. Given that Policy STRAT7 allocates Chalgrove Airfield for a new settlement, it cannot then require an assessment of "the potential impacts of a new settlement" on the heritage assets. Such an assessment is fundamental to site selection and needs to be carried out prior to the inclusion of the allocation in the plan. Has that assessment taken place? If it has already been carried out, the requirement should be re-worded to "(vi) addresses heritage assets and their settings in accordance with Policies ENV6 to ENV10 of this Plan and the NPPF."

11. (STRAT8) This is a similar point to 10 and is in any case not necessary because it is covered by Policies ENV6 to ENV10. The policy could simply reference those policies as a minor modification.

15. (STRAT9) This additional criterion is not specific enough to enable a developer or development manager to know what is required.

29. (STRAT13). The additional wording is unnecessary and does not in any case reflect either the statutory duty or the full terms of Policy ENV7. It would be more appropriate to re-word it to say “(ii) preserves or enhances listed buildings and their settings, both within and surrounding the site, in accordance with Policy ENV7”.

45 (H11) See our comments and questions on the policies: whilst the intent of the modification is appropriate, it leaves an inconsistency between parts 3 and 4 of the policy in terms of the percentage of M4(3) homes required.

46 (H11). The revised explanatory text with its reference to marketing no longer appears relevant in view of the proposed change to Policy H11 in modification 45.

#### **MAIN MODIFICATIONS THAT CANNOT BE RECOMMENDED**

The following modifications suggested by the Council would amount to main modifications but are either not necessary for soundness or are not themselves sound and should not be taken forward.

8: (STRAT4) Not required for soundness because the items referred to are covered elsewhere in the plan.

16. (STRAT10) This may be unsound. The requirement to undertake a minerals assessment and potentially seek extraction prior to development could well obstruct one of the primary purposes of the plan, which is to deliver homes at the earliest opportunity.

18 (STRAT10) Not necessary for soundness because this is covered by modification 17 and the archaeological policy itself.

25 (STRAT12) Not required for soundness since the point is covered in 2(vi).

50 (TRANS4) The last part of TRANS4(1)) is not appropriate and the proposed modification is not necessary for soundness. For many schemes it should not be necessary for a developer to agree the scope of a transport assessment or statement with either Highways England or Oxfordshire County Council; it depends on the scale and location of the development. The local planning authority, who is the authority determining the planning application, should be the first source of any advice on scoping. The last part of TRANS4(1) (“These documents will need to take into account...”) should be taken out. Advice could be inserted into the supporting text instead to indicate which guidance should be taken into account and to state that on very large schemes the Council may advise developers to seek the advice of the County Council and Highways England where relevant.

51 (TRANS5) The additional text makes this policy too prescriptive and is not necessary for soundness; there will be a variety of ways in which good access to public transport can be achieved but they will not always include cycle routes to bus stops. Cycling is in any case covered in 1(ii) and (iii).

59 (DES8) The change is not required for soundness. In addition, it lacks clarity since “natural resources” is a more commonly understood expression.

## **South Oxfordshire Local Plan**

### **Inspectors' initial questions and comments: Part 3**

Our first set of initial questions addressed the Plan's spatial strategy, together with the provision of land for housing and employment; Set 2 dealt with a range of other policies for the management of development. This third set addresses site allocations and infrastructure provision.

#### **General**

What is the status of the concept plans for the strategic allocations? What level of analysis and consultation has taken place to arrive at them? Do they pre-empt decisions that ought to be taken during the masterplanning process?

#### **STRAT3: Didcot Garden Town**

STRAT3 is a very general policy and the design principles set out in Appendix 6 do not appear to be particularly specific to the development of the Garden Town (apart from the mention of local monuments). Indeed, it is arguable that these principles should apply everywhere. They do not help to understand how the town is to be developed and what the role of the current plan is in delivering the town. Please can the Council explain why Policy STRAT3 does not contain any more specific development objectives or targets that will assist people to understand how the Garden Town is to be developed and how the site allocations in this plan relate to it. Do the scale of development and the importance of the overall project point towards the need for a more directional policy with a positive forward vision?

Paragraph 4.51 refers to the possibility of a future supplementary planning document (SPD) which would set out additional planning policy for the Garden Town. That cannot be the case, since there is not enough in STRAT3 to guide an SPD, and in any case, an SPD is not a development plan document and would not be able to make allocations. If the development framework for the Garden Town cannot be set out more fully in the submitted plan, it will be necessary to produce another development plan document such as a plan revision or an area action plan to govern the town's development. The Council are invited to comment.

Finally, the Didcot Garden Town Delivery Area will need to be shown on the Policies Map if it is to be referred to in this policy.

#### **STRAT7: Land at Chalgrove Airfield**

STRAT7 requires a number of significant projects to be delivered in order to develop this site, including transport infrastructure, education and health facilities. We note the contents of the Infrastructure Delivery Schedule, including the estimated infrastructure costs, which for transport are set out as £80m to £100m. We could not find any dates associated with the delivery of any of this infrastructure and we hope the Council can help us with this.

We also note the representation from a current leaseholder on the site indicating that the company does not intend to move.

Please can the Council either point to direct evidence, or provide us with a piece of work, to help us to understand how it has reached the conclusion that the indicated 2,025 homes will be delivered on this site within the plan period, taking into account viability, realistic and known dates and thresholds for the provision of the necessary infrastructure, the existence of an active use on the

site, realistic commencement dates and realistic delivery rates. What are the key requirements that must be fulfilled before development can commence?

Please can the Council also help us to understand whether the reorganisation or removal of the existing site occupier, including the stated potential use of a compulsory purchase order in paragraph 4.64 of the submitted plan, is compatible with its policy to retain employment land in Policy EMP3 and its objective to support the growth of all employment sectors as indicated in paragraph 6.15 of the submitted plan.

We have raised the question of the choice of this site's location in our first set of initial questions, but please can the Council explain how the allocation of this site, given its location, will contribute to the submitted plan's sustainability and climate change objectives.

**STRAT8: Culham Science Centre**

To what extent does the site contribute to the openness of the Green Belt?

What are the exceptional circumstances?

Should the front part of the site be inset from the Green Belt along with the rest of the site?

Why does the Council want the increase in employment land distributed across STRAT8 and STRAT9? Should considerations such as this be for the masterplan or planning application?

**STRAT9: Land Adjacent to Culham Science Centre**

STRAT9 requires a number of significant projects to be delivered in order to develop this site, including a Thames crossing and new and upgraded junctions, and improvements to Culham Station. transport infrastructure, education and health facilities. We note the contents of the Infrastructure Delivery Schedule. We could not find any dates associated with the delivery of any of this infrastructure and we hope the Council can help us with this. What are the key requirements that must be fulfilled before development can commence?

As with STRAT7, please can the Council either point to direct evidence, or provide us with a piece of work, to help us to understand how it has reached the conclusion that the indicated 1,850 homes will be delivered on this site within the plan period, taking into account realistic and known dates and thresholds for the provision of the necessary infrastructure, realistic commencement dates and realistic delivery rates.

The strategic-level justification for releasing land from the Green Belt was referred to in our first set of initial questions. Against that background, what in the Council's view are the local level exceptional circumstances for releasing this particular land from the Green Belt?

**STRAT10: Land at Berinsfield**

Berinsfield has decent houses, gardens and open space and a small range of village facilities. What is it about Berinsfield that needs regenerating? What are the "barriers" to housing and education referred to in paragraph 4.79 of the submitted plan? Are these not able to be fulfilled by the local authorities' statutory duties and functions?

The development in this allocation expects to deliver 1,600 homes in the plan period. Please can the Council explain how a development of this size can viably support "the entire cost of the necessary regeneration package" for the existing village (part 2(i) of the policy) as well as all the other requirements in parts 2(ii) to (vi) of the policy?

Why is the full regeneration package necessary to mitigate the impact of the new housing allocation? Is it fairly and reasonably related to the allocation?

What is the position regarding the delivery of the transport infrastructure including the new junction and access? Is there control over the land?

Given the lead in times for the provision of the regeneration package and the transport infrastructure, please can the Council either point to direct evidence, or provide us with a piece of work, to help us to understand how it has reached the conclusion that the indicated 1,600 homes will be delivered on this site within the plan period, taking into account realistic and known dates and thresholds for the provision of the necessary infrastructure, realistic commencement dates and realistic delivery rates. What are the key requirements that must be fulfilled before development can commence and what are the factors that affect delivery rates?

The strategic-level justification for releasing land from the Green Belt was referred to in our first set of initial questions. Against that background, what in the Council's view are the local level exceptional circumstances for releasing this particular land from the Green Belt?

We have raised the question of the choice of this site's location in our first set of initial questions, but please can the Council explain how the allocation of this site, given its location, will contribute to the submitted plan's sustainability and climate change objectives.

**STRAT 11: Land South of Grenoble Road**

Please will the Council explain the relationship of this site to the provision of the new park and ride facility and other infrastructure requirements, in terms of both timing and funding.

We would like the Council to explain how it arrived at the figure of 1,700 homes to be delivered in the plan period, out of a total of 3,000. What are the key requirements that must be fulfilled before development can commence, and what factors influence delivery rates?

The strategic-level justification for releasing land from the Green Belt was referred to in our first set of initial questions. Against that background, what in the Council's view are the local level exceptional circumstances for releasing this particular land from the Green Belt?

**STRAT12: Land at Northfield**

Are there any risks to the delivery of 1,800 homes during the plan period, in terms of infrastructure provision, viability, commencement dates and infrastructure delivery?

Given the position of major industrial plant between the site and the rest of the built up area, how could attractive walking, cycling and other transport connections be achieved between the site and the town centre and remainder of the city?

The strategic-level justification for releasing land from the Green Belt was referred to in our first set of initial questions. Against that background, what in the Council's view are the local level exceptional circumstances for releasing this particular land from the Green Belt? What regard should be had to the separation between Oxford and Garsington?

**STRAT 13: Land North of Bayswater Brook**

Are there any risks to the delivery of 1,100 homes during the plan period, in terms of infrastructure provision, commencement dates and infrastructure delivery? How would the road accesses be provided and funded and what is their timing?

If more detailed evidence indicates that a new link road is required, what effect would that have on delivery?

The strategic-level justification for releasing land from the Green Belt was referred to in our first set of initial questions. Against that background, what in the Council's view are the local level exceptional circumstances for releasing this particular land from the Green Belt?

How could the integrity of the SSSIs of Sidlings Copse and College Pond be protected?

**STRAT14: Land at Wheatley Campus**

The relationship between this proposal and the emerging Wheatley Neighbourhood Development Plan is not entirely clear from the plan. What is the timescale for the neighbourhood plan process? Do the proposals in the submitted local plan align with emerging proposals in the neighbourhood plan?

The strategic-level justification for releasing land from the Green Belt was referred to in our first set of initial questions. Against that background, what in the Council's view are the local level exceptional circumstances for inseting this particular land from the Green Belt? Could the existing developed area be redeveloped as previously developed land within the Green Belt?

Could development be extended to the south western part of the site without harm to the heritage assets and their settings?

Could a bus service be sustained through a development of 300 homes?

**HEN1: The Strategy for Henley-on-Thames**

Part 1(i) of the policy is unnecessary and should be deleted since the joint Henley-on-Thames and Harpsden Neighbourhood Plan stands as a development plan in its own right, as would be any subsequent made neighbourhood plan, and it does not require a local plan policy to endorse development that accords with it.

How many new homes would be delivered in Henley during the plan period and would this be sufficient to cater for the local need for market and affordable housing?

**TH1: The Strategy for Thame**

Part 1(i) of the policy is unnecessary and should be deleted since the Thame Neighbourhood Plan stands as a development plan in its own right, as would be any subsequent made neighbourhood plan, and does not require a local plan policy to endorse development that accords with it.

What is the reason for not allocating a greater number of homes at Thame? How many new homes would be delivered in Thame during the plan period and would this be sufficient to cater for the local need for market and affordable housing?

**WAL1: The Strategy for Wallingford**

Under part 1(i) of the policy, the Council cannot support proposals that have regard to a neighbourhood plan "appropriate to its stage in the plan making process". This is ineffective because its effect is unclear; either proposals are supported by the policy or they are not. The local plan cannot give greater weight to an emerging neighbourhood plan than the latter itself would attract as a material consideration. It is also unnecessary to have a policy supporting another development plan.

How many new homes would be delivered in Wallingford during the plan period and would this be sufficient to cater for the local need for market and affordable housing? Is there a regeneration argument for allocating more land for housing?

**GENERAL INFRASTRUCTURE PROVISION**

We have noted the contents of the Oxford infrastructure Strategy and the South Oxfordshire Local Plan 2034 Infrastructure Delivery Plan. Issues concerning viability and the funding and timing of infrastructure relating to the various housing allocations are raised in the questions above. However, we would also like the Council to provide an overarching comment on funding, timing and viability, with regard to the following comments.

There is no indication within the IDP's Appendices (the individual Infrastructure Schedules for the strategic and other allocations) of the proportion of central government grant (Growth Deal or HIF funding) that is expected to fund key elements of infrastructure. For example, Appendix 2.9 (the District-wide Infrastructure Schedule) lists many of the strategic elements of transport infrastructure such as the Culham-Didcot Thames River Crossing and the Clifton Hampden bypass and so on; whilst estimated costs are given, it is unclear how much of these funds will be delivered by grant funding and when such funds will be available. All the necessary infrastructure appears to require at least some funding from CIL/S106, which implies that its delivery is dependent on at least some dwellings being delivered in advance of the infrastructure being provided. Please can the Council explain how this will work? It is also unclear whether and to what extent forward funding of key infrastructure is necessary and if so which elements of it, and whether the Council or the Growth Board has such forward funding in place.

# South Oxfordshire District Council

## SCHEDULE OF PROPOSED MODIFICATIONS



MARCH 2019

## SCHEDULE OF PROPOSED MODIFICATIONS FOLLOWING REGULATION 19 CONSULTATION

\* of the Reg 19 published Local Plan

### CHAPTER - CONTENTS PAGE

Mod No.	Category	Policy No.	Paragraph No.	Page number	Modification	Reason
1	Officer Identified	Contents Page	n/a	3	Amend Policy title TRANS1a: Supporting Strategic Transport Investment across the Oxford to Cambridge <del>Arc</del> <u>expressway</u> .	Incorrect references to Expressway when it should have referred more generally to the 'Arc'

### CHAPTER - VISION/ OBJECTIVES/ STRATEGIC POLICIES

Mod No.	Category	Policy No.	Paragraph No.	Page number*	Modification	Reason
2	Officer Identified	n/a	n/a	14	Add to Diagram of Local Plan documents: Landscape capacity assessment <u>&amp; Historic Landscape Characterisation Project</u>	Missing component of evidence that is not referenced in diagram
3	Officer Identified	Spatial Strategy	4.3	25	The plan seeks to meet needs identified for South Oxfordshire as well as all the needs <u>apportioned to the District</u> arising from our neighbour Oxford city. A joint work programme with the other Oxfordshire authorities has been progressing on the scale of Oxford city's unmet needs and how they can best be met.	Additional wording to reflect apportionment
4	Sustainability Appraisal - Reasonable Alternatives	Spatial Strategy	4.8	26	Each of these options has been consulted upon and tested through the Sustainability appraisal. the preferred option for the council is to principally focus development at Science Vale and sustainable settlements (which include towns and Larger villages), where over 70% of housing will be located and to deliver elements of some of these options rather than favouring any one scenario in isolation. The strategy draws together the Core Strategy approach with development at Science Vale and next to the neighbouring major urban area of Oxford. It is also complemented by the <u>identification of new settlements and the location of development to fund regeneration and by the Local Plan raising densities. Drawing on a combined approach to the distribution of new housing development enables a series of benefits to be delivered through the Local Plan and this ensures that the housing needs of the District can be accommodated.</u>	Error to reference to new settlements - there are no allocated new settlements in the Plan.
5	Spatial Strategy - Object	STRAT1	1	28	Amend bullet 1 to: Focusing major new development in Science Vale including <u>sustainable growth at</u> Didcot Garden town and Culham so that this area can play an enhanced role in providing homes, jobs and services with improved transport connectivity;	Wording suggested by responder to Regulation 19 consultation, wording proposed is reflective of the aim of the strategy
6	Officer Identified	STRAT2	4.16	30	The NPPF4 and Planning Practice Guidance5 <u>direct expects</u> . Local Planning Authorities to use the "standard method" to establish the minimum local housing need figure. For South Oxfordshire this results in an annual housing need of 556 homes a year. This figure represents the minimum annual housing need for South Oxfordshire. It does not automatically translate into the housing requirement for the Local Plan that will need to take into account other factors when determining the homes to plan for.	To reflect NPPF revision released Feb 2019.
7	Officer Identified	STRAT2	4.30	33	Along with the other authorities in Oxfordshire, the Council will continue to monitor the housing needs of Oxford City. The <u>Joint Strategic Spatial Oxfordshire Plan 2050</u> will be the appropriate plan for addressing any needs that arise after 2031.	To refer to the latest name of the Oxfordshire Plan 2050 - renamed after publication of the South Oxfordshire Local Plan in December 2018.
8	Strategic Sites - Policy requirements supported	STRAT4	6(i)	40	a scheme of an appropriate scale, layout and form which respects the surrounding character and setting <u>and be supported by a heritage impact assessment and archaeological desk based assessment</u> ;	To reflect Historic England representation to the Regulation 19 consultation, and to reflect other policy provision in the Plan
9	Officer Identified	STRAT6	4.66	45	The airfield is flat and largely free from constraints. The site is predominately "previously developed land". There are no known archaeological or ecological constraints. "Chalgrove Field 1643", a registered historic battlefield, is located <u>adjacent to the site partly within and to the east of the site and represents a significant constraint</u> .	To clarify what constraints the council has identified
10	Officer Identified	STRAT6	3(vi)	48	vi) <u>respects the setting of the Listed Buildings and the Registered Battlefield (Battle of Chalgrove 1643): a layout and form which redrafted criteria vi: respects the setting of the Listed Buildings (particularly Rofford Hall and Rofford Manor) the Registered Battlefield and the significance of the former World War 2 airfield and the potential archaeological interest of the site, based on a detailed assessment of the significance of the Registered Battlefield and of the airfield itself, and of the potential impacts of a new settlement on that significance and of a detailed assessment and evaluation of the archaeological interest of the site</u>	Partly influenced by Regulation 19 responses from Historic England, and to reflect other policy provision in the Plan
11	Officer Identified	STRAT8	2	52	Add to paragraph 2 of policy: The exact siting and phasing of the employment development must be agreed through the master planning and subsequent planning application process <u>including detailed evidence being collected prior to development to evaluate the historic significance of existing buildings</u> .	Partly influenced by Regulation 19 responses from Historic England, and to reflect other policy provision in the Plan
12	Officer Identified	STRAT9	2	52	Delete 2: The proposed development at Culham will deliver a scheme in accordance with an agreed comprehensive masterplan, taking into consideration this policy's concept plan. The masterplan must be prepared in collaboration with and agreed with the Local Planning Authority. Renumber subsequent policy paragraphs	Deletion of repeated paragraph in Policy. Renumber the remaining policy paragraphs owing to deletion of paragraph 2
13	Officer Identified	STRAT9	4(iii)	54	Add to criteria iii: This shall be based on a landscape character, including historic landscape characterization <u>considering the contribution of the site to the setting of Oxford</u> , that preserve and enhance the surrounding Green Belt Way and River Thames long distance footpaths;	Partly influenced by Regulation 19 responses from Historic England, and to reflect other policy provision in the Plan
14	Officer Identified	STRAT10	4.84	57	In order to deliver the regeneration package the plan needs to allow for a sufficient number of homes to be built at the village. <u>The development will also need to make sure it can mitigate its impact on the infrastructure network and will need to make contributions to some expensive projects, including the new River Thames bridge at Culham, the Clifton Hampden bypass, improvements to Golden Ball's roundabout and a new secondary school on the strategic allocation at Culham</u>	Repetition of paragraph 4.89
15	Officer Identified	STRAT10	2(vi)	59	Add new criterion d: <u>provision for excellent public transport facilities</u>	To reflect IDP
16	Officer Identified	STRAT10	2(viii)	59	Amend viii: be accompanied by a minerals assessment that considers if minerals can be extracted and used <u>on site</u> in accordance with Policy EP5; and	Minerals exists adjacent to the site
17	Officer Identified	STRAT10	2(ix)	59	Amend ix: be accompanied by an archaeological assessment that considers the areas of <u>known and potential</u> archaeological <u>constraint</u> <u>interest of the site</u> in accordance with Policy ENV9 <u>and informs the development layout and form</u> .	Partly influenced by Regulation 19 responses from Historic England, and to reflect other policy provision in the Plan
18	Officer Identified	STRAT10	3(ii)	59	<u>ii) no greater land-take of greenfield land than is necessary to deliver the required regeneration and other relevant policy requirements. Any part of the developable greenfield area that is not required for housing or related infrastructure should provide green infrastructure including planting to contain the settlement edge; - iii) That it has taken account of the archaeological desk based assessment.</u>	Partly influenced by Regulation 19 responses from Historic England, and to reflect other policy provision in the Plan
19	Officer Identified	STRAT11	1	63	Land within the strategic allocation at Grenoble Road will be developed to deliver approximately 3000 new homes, 1700 <u>expected</u> , within this Plan period,	For consistency with other STRAT policies
20	Officer Identified	STRAT11	2(vii)	64	Amend vii: sufficient education capacity, likely to be on-site primary school provision of two 2-form entry primary schools, <u>10-55 hectares for a one new 8 form entry</u> secondary school with <u>an initial capacity of 600 students and this should have the capability to expand to meet future needs</u> sixth form and appropriate contributions towards Special Education Needs (SEN);	To reflect IDP
21	Officer Identified	STRAT11	2(ix)	64	Add new criteria c: <u>improvements to highway infrastructure in the vicinity of the site</u>	To reflect IDP and consistency with other STRAT
22	Officer Identified	STRAT11	3(ii)	64	a landscaped urban edge can be created to the south of the site to provide a transition into the wider landscape through woodland planting. The landscape planting should create a strong and defensible edge to Oxford, <u>and create a permanent sense of openness between the site and Nuneham Courtenay, Marsh Baldon, Toot Baldon and Garsington and green infrastructure only should be provided on land to the south of Minchery Farmhouse to respect the setting of the Grade II* listed farmhouse;</u>	Partly influenced by Regulation 19 responses from Historic England, and to explain the indicative concept plans provisions more clearly
23	Officer Identified	STRAT12	4.105	65	Delete last sentence of 4.105 <u>in line with the concept Plan below</u>	Unnecessary reference
24	Officer Identified	STRAT12	2(iii)	66	Amend 2(iii) sufficient educational capacity likely to be a new 3-form entry primary school and appropriate contributions towards an <u>other off-site</u> secondary school and Special Education Needs (SEN);	Clarity
25	Officer Identified	STRAT12	2(vi)	67	Add criteria e: <u>improvements to highways infrastructure in the vicinity of the site</u> .	To reflect IDP and consistency with other STRAT
26	Officer Identified	STRAT13	4.110	69	Amend 4.110: A designated Oxford view cone lie directly to the west of the site. This area is <u>safeguarded identified</u> for access only and is not proposed to be inset from the Green Belt.	To clarify that terminology should not be confused with formal safeguarding
27	Officer Identified	STRAT13	2(v)(b)	71	provision of sustainable transport connectivity improvements to overcome severance caused by the A40 <u>Oxford Northern Bypass</u> ;	To use correct name of highway referenced
28	Officer Identified	STRAT13	3	72	Amend 3: Proposals will be <u>required expected</u> to deliver a masterplan	For consistency with other STRAT policies
29	Officer Identified	STRAT13	3(ii)	72	Amend 3(ii): <u>respects listed buildings and structures, both within and surrounding the site, and their settings; conserves or enhances the significance of listed buildings and structures within and surrounding the site, and the appreciation of that significance, and preserves or enhances their settings;</u>	Partly influenced by Regulation 19 responses from Historic England, and to explain the indicative concept plans provisions more clearly

30	Officer Identified	STRAT13	4	73	Amend 4: An archaeological assessment will need to be undertaken before the <u>preparation of the masterplan determination of any planning application for this site</u> . Following this assessment, a scheme of appropriate mitigation should be established, to include the physical preservation of significant archaeological features and their setting <del>where appropriate</del> .	To reflect evidence required for this site
31	Wheatley Campus - Comments from Oxfordshire County Council	STRAT14	2(a)	77	Amend a: cycling and walking links <del>to the centres of Milton and Wheatley and to the primary school;</del>	In response to OCC Regulation 19 response and to reflect the IDP
32	Wheatley Campus - Comments from Oxfordshire County Council	STRAT14	2(v)	77	Amend 2(v) a programme of archaeological evaluation and mitigation to be undertaken ahead of <u>the preparation of the masterplan any development</u> ; and	In response to OCC Regulation 19 response

## CHAPTER DELIVERING NEW HOMES

Mod No.	Category	Policy No.	Paragraph No.	Page number	Modification	
33	Miscellaneous comments - NDPs	n/a	n/a	n/a	Update all housing supply references to NDPs made since the publication of the Local Plan: Para 5.6: In South Oxfordshire we currently have <del>12</del> <b>14</b> made Neighbourhood Development Plans. The majority of the sites allocated in these plans are on smaller sites, with only a handful of sites extending over 100 homes in total.	To reflect the most up to date NDP preparation status
34	Miscellaneous comments - NDPs	n/a	n/a	n/a	Update all housing supply references to NDPs made since the publication of the Local Plan: Para 5.10: At the time of publication Neighbourhood Development Plans have been made at Benson, Brightwell-cum-Sotwell, <u>Chalgrove</u> , Chinnor, Dorchester-on-Thames, Henley-on-Thames and Harpsden, <u>Little Milton</u> , Long Wittenham, Thame, The Baldons, Sonning Common, Warborough and Shillingford, Watlington and Woodcote. The council continue to support the creation of Neighbourhood Development Plans	To reflect the most up to date NDP preparation status
35	Saved Policies	H2	n/a	88	Add new paragraph 2: <u>Land within the allocation at Ladygrove East will be developed to deliver approximately 642 new homes. Proposals will be expected to deliver a network of public urban spaces and public greenspaces (not less than 8 hectares) with the largest greenspace comprising a local park (not less than 6 hectares) containing an equipped children's play area, open grassland, woodland, wetland, ponds and watercourses located in the southwestern part of the allocated area. Other greenspaces will comprise green corridors in the movement network and buffer zones, containing open grassland, earth mounding and woodland. The buffer zones will be of sufficient width to protect homes from noise generated on major distributor roads and to protect road users from the Hadden Hill golf course.</u>	Site specific elements of these policies will need to remain in place. This modification incorporates one of the sites in Didcot (Ladygrove East). Comments were received during the Publication Consultation of the Local Plan that questioned why these housing sites (which do not yet benefit fully from detailed planning permission) no longer featured explicitly in the Local Plan.
36	Officer Identified	H2	5.15	89	Amend 5.15: If a Neighbourhood Development Plan does not progress within a specified time frame, the council, as the local planning authority, will allocate sites for housing in those towns. To support this, the published <del>Strategic</del> Housing Land Availability Assessment will be used as the basis to identify suitable, available and achievable sites. This would be done by working with the local community and parish council.	Clarity
37	Officer Identified	H2	5.16	89	Add to final sentence of para 5.16: <u>Neighbourhood planning groups will need to cooperate with infrastructure providers and statutory consultees to provide this evidence, and develop viable solutions for any infrastructure provision that is needed.</u>	Clarity
38	Saved Policies	H3	n/a	90	Add new paragraph 3: <u>Land within the allocation at West of Wallingford will be developed to deliver approximately 555 new homes. Proposals will be expected to deliver:</u>  <u>i. Access from the western bypass, with no vehicular access provided through Queen's Avenue and the discouragement of traffic from entering the Wallingford AQMA;</u>  <u>ii. The western and southern boundaries are reinforced with significant landscape buffers, with no built development along the western boundary adjacent to the bypass.</u>	A site previously allocated in the old Local Plan will need to be carried over to the new Local Plan as site specific elements of that policy will need to remain in place. This modification incorporates the site to the West of Wallingford (known locally as "Site B"). Comments were received during the Publication Consultation of the Local Plan that questioned why this housing site (which do not yet benefit fully from detailed planning permission) no longer featured explicitly in the Local Plan.
39	Officer Identified	H3	5.21	91	Amend 5.21: If a Neighbourhood Development Plan does not progress within a specified time frame, the local planning authority will allocate sites for housing in those villages. To support this, the published <del>Strategic</del> Housing Land Availability Assessment will be used to identify suitable, available and achievable sites. This would be done by working with the local community and parish council.	Clarity
40	Officer Identified	H3	5.25	92	Amend 5.25: <del>Ten</del> <b>Eleven</b> of these twelve villages are either in the process of preparing a Neighbourhood Development Plan, or already have a "made" plan. The Local Plan's proposed strategy for housing distribution in the larger villages is for each settlement to grow proportionally by around 15% from the 2011 base date, plus any housing allocated to that village through the Core Strategy.	To reflect the most up to date NDP preparation status
41	Officer Identified	H3	5.30	93	Add to final sentence of para 5.30: <u>Neighbourhood planning groups will need to cooperate with infrastructure providers and statutory consultees to provide this evidence, and develop viable solutions for any infrastructure provision that is needed.</u>	Clarity
42	Officer Identified	H9	5.43	98	Add to 5.43: The starting position for the provision of affordable housing is outlined in Policy H9. <u>Policy H9 is supplemented by a robust evidence base demonstrating the viability of its requirements.</u>	Missing reference to evidence which is available and supports the policy
43	Officer Identified	H9	2(iii)	99	iii) The Council will expect a tenure mix of 40% affordable rented, 35% social rented and 25% other affordable routes to home ownership with the exception of Berinsfield <u>(see specific tenure considerations in Policy STRAT10);</u>	To refer to deviation of policy that should have been referenced
44	Officer Identified	H9	5.46	100	Amend 5.46: The exact amount of affordable housing and tenure mix on each site will be agreed through negotiation between developers and South Oxfordshire District council, and Policy H9 will be the starting position. A request for a departure from this by a planning applicant is expected to be supported by robust evidence, including viability assessments where required and will only be supported exceptionally. The council's current housing strategy, and where relevant and appropriate, local housing needs surveys <u>including Oxfordshire County Council Children and Education Service needs surveys</u> , will inform these negotiations. The council will monitor the delivery of affordable housing through Policy H9 and review the Housing Delivery Strategy periodically to ensure that the aim to provide a healthy mix of houses is fulfilled.	In response to OCC Regulation 19 response
45	Officer Identified	H11	4	103	Amend para 4: On sites of 100 dwellings or more plots should be set aside to allow for at least 3% of <u>market-affordable housing dwellings</u> to be designed to the standards of Part M (4) Category 3: wheelchair accessible dwellings (or any replacement standards). The exact requirement should be based on evidence regarding current demand. <del>The plots should be marketed to an acceptable level for a period of 12 months to identify an appropriate buyer.</del>	To reflect new NPPF/NPPG
46	Officer Identified	H11	5.60	105	Amend para 5.60: Very few wheelchair accessible properties are available in the district. In the last 5 years only 3 properties have been developed. There is evidence of some need for wheelchair accessible properties, in line with Part M (4) category 3: wheelchair accessible dwellings of building regulations, within the affordable housing sector. The need for wheelchair accessible properties is relatively small (2.3%) in the market housing sector. Therefore Policy H1 of the Local Plan requires the provision of 3% of <u>affordable homes to be open market plots to be marketed</u> as wheelchair accessible homes on sites of 100 homes or more. These plots should be meaningfully marketed for a period of 12 months, and where a buyer cannot be secured, they can be remarketed as <u>standard housing an alternative affordable</u> product in accordance with other policies in this Plan. It also ensures that the features of the property match the individual needs of the buyer.	To reflect new NPPF/NPPG

47	Officer Identified	H14	1	109	Amend final bullet: 3 pitches for Gypsies and Travellers at Land adjacent to Culham Science Centre ( <del>STRAT</del> <b>STRATS</b> ) as shown on the policies map	To correct wrong policy reference
48	Officer Identified	H19	2	116	Amend para 2: In the case of proposals for the re-use of an <u>isolated</u> rural building(s) for residential use where planning permission is required it will only be granted where other uses have been explored and found to be unacceptable in planning terms and where the location constitutes sustainable development.	To reflect new NPPF

## CHAPTER - INFRASTRUCTURE

Mod No.	Category	Policy No.	Paragraph No.	Page number	Modification	Reason
49	Officer Identified	TRANS1a	n/a	3, 151, 235	Oxford to Cambridge <del>Arc</del> <b>expressway</b>	Incorrect references to Expressway when it should have referred more generally to the 'Arc'
50	Officer Identified	TRANS4	1	158	Amend Para 1: Proposals for new developments which have significant transport implications that either arise from the development proposed or cumulatively with other proposals will need to submit a transport assessment or a transport statement, and where relevant a Travel Plan. These documents will need to take into account Oxfordshire County Council guidance and Planning Practice Guidance <sup>28</sup> and <del>where appropriate</del> , the scope should be agreed with <u>Oxfordshire County Council and where appropriate</u> Highways England <sup>29</sup> .	To correct the references to whom transport assessments should be agreed with
51	Consideration of development proposals - Parking	TRANS5	1(iv)	160	iv) be designed to facilitate access to high quality public transport routes, including safe walking <b>and cycling</b> routes to nearby bus stops or new bus stops;	In response to OCC Regulation 19 response

## CHAPTER - NATURAL AND HISTORIC ENVIRONMENT

Mod No.	Category	Policy No.	Paragraph No.	Page number	Modification	Reason
52	Officer Identified	n/a	8.3	167	The whole District is rich in biodiversity, including international, national and locally protected sites and habitats <b>and forms a part of a wider ecological network across the County</b> . Maintaining sustainable agricultural land and practices is important in preserving the district's rural character and landscape.	In response to OCC Regulation 19 response
53	Officer Identified	n/a	8.6	167	Amend 8.6: The district has a rich cultural history that has provided South Oxfordshire with over 3,500 listed buildings, 52 scheduled monuments, 13 registered Parks and Gardens, a registered battlefield, and 72 conservation areas. Sadly in 2017 there are 15 sites on the Heritage at risk register. Parts of the district's natural environment and <del>some</del> <b>many</b> historic assets are of national significance. These heritage assets <sup>32</sup> help establish the distinctive character of South Oxfordshire. We seek to ensure the conservation, enhancement, enjoyment and understanding of all our heritage assets as they make a positive contribution to sustainable communities, including their economic vitality.	To reflect the assets of the District
54	Officer Identified	ENV7 Listed Buildings	Under 8.33	181	Add new paragraph to supporting text: <b><u>"Many listed buildings, due to their age and construction, have features which could support roosting bats. To ensure compliance with relevant legislation, species survey information will be required, and ecological conditions applied to consents granted, in instances where proposed works to listed buildings would be reasonably likely to impact roosting bats."</u></b>	To reflect the LPA responsibility as a "competent authority" under The Conservation of Habitats and Species Regulations 2017 (as amended). Regulation 9(3) puts a responsibility on the LPA to consider how, in exercising any of our functions, our decision making impacts the goals of the Habitats Directive (main piece of European law protecting certain species and sites). The Councils legal opinion (and a relevant appeal decision) has confirmed that we should be considering how works to a listed building, that do not require planning permission (re-roofing, roof insulation, internal conversion), may impact protected species - mainly bats.
55	Officer Identified	ENV10	1	185	Amend paragraph 1: Proposals should conserve or enhance the special historic interest, character or setting of a <del>designated</del> <b>battlefield, historic landscape or</b> park or garden <del>on</del> <b>contained in</b> the Historic England Registers <del>of Historic Battlefields or Register of Historic Parks and Gardens of Special Historic Interest in England.</del>	In response to Historic England Regulation 19 response
56	Officer Identified	ENV10	2	185	Add new para 2: <b><u>Any harm to or loss of significance of any heritage asset requires clear and convincing justification. Substantial harm to or loss of these assets should be wholly exceptional in the case of Registered Historic Battlefields and Grade I and Grade II* Registered Historic Parks and Gardens and exceptional in the case of Grade II Registered Historic Parks and Gardens.</u></b>	In response to Historic England Regulation 19 response
57	Officer Identified	ENV10	3	186	Amend new para 3: Where a proposed development will lead to substantial harm to or total loss of significance of <del>such a</del> <b>designated</b> heritage assets, consent will only be granted where it can be demonstrated that the substantial	In response to Historic England Regulation 19 response
58	Officer Identified	ENV10	4	186	<del>Delete from para 4: Substantial harm to or loss of these assets should be wholly exceptional in the case of grade I and grade II* sites and require clear and convincing justification in other cases.</del>	In response to Historic England Regulation 19 response

## CHAPTER - BUILT ENVIRONMENT

Mod No.	Category	Policy No.	Paragraph No.	Page number	Modification	Reason
59	Officer Identified	DES8	1	206	Amend para 1: New development is required to make provision for the effective use <del>and</del> protection <b>and enhancement</b> of <del>the</del> <b>natural resources</b> <del>capital</del> where applicable, including:	In response to OCC Regulation 19 response

## CHAPTER - POLICIES MAP

Mod No.	Category	Policy No.	Paragraph No.	Page number	Modification	Reason
60	Mineral safeguarding areas	Policies Map	Key	n/a	The key to the policies map says Minerals Safeguarding Areas (EMP5). This should be Minerals Safeguarding Areas (EP5).	Error in policy reference

## CHAPTER - MONITORING AND REVIEW

Mod No.	Category	Policy No.	Paragraph No.	Page number	Modification	Reason
61	Officer Identified	Monitoring and Review	TRANS1a	235	Policy TRANS1a: Supporting Strategic Transport Investment across the Oxford to Cambridge <del>expressway</del> <b>Arc</b>	Incorrect references to Expressway when it should have referred more generally to the 'Arc'
62	Officer Identified	Monitoring and Review	TRANS1a	235	Progress of infrastructure within the Oxford to Cambridge <del>expressway</del> <b>Arc</b>	Incorrect references to Expressway when it should have referred more generally to the 'Arc'
63	Officer Identified	Monitoring and Review	TRANS1a	235	Positive progress towards the Oxford to Cambridge <del>expressway's</del> <b>Arc</b> identified priorities	Incorrect references to Expressway when it should have referred more generally to the 'Arc'

## APPENDICES

Mod No.	Category	Policy No.	Paragraph No.	Page number	Modification	Reason
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64	Officer Identified	Appendix 1	n/a	247	<b>Amend</b> Major Development (large-scale) definition: Largescale Major Developments. For dwellings, a largescale major development is one where the number of residential dwellings to be constructed is 200 or more or 1,000sqm of industrial, commercial or retail floor space. Where the number of residential dwellings or floor space to be to be constructed is not given in the application a site area of 4 hectares or more should be used as the definition of a major development. For all other uses a largescale major development is one where the floorspace to be built is more than 10,000sqm, or where the site area is more than 2 hectares. The definition for major development in the AONB differs. Please refer to NPPF paragraph <del>416</del> <b>172</b> .	Amended paragraph number to reflect change within NPPF paragraph referencing
65	Statutory- Oxfordshire County Council	Appendix 5	n/a	269	Change map title "a new Thames <del>road</del> <b>River</b> crossing between Culham and Didcot Garden Town"	Suggested by Oxfordshire County Council to better reflect function of the crossing
66	Officer Identified	Appendix 7 Settlement Hierarchy	n/a	280	Delete 'Berrick Salome' and 'Cuddesdon' from the Other Villages list. Insert 'Berrick Salome' and 'Cuddesdon' under the Smaller Villages list	Drafting error – This was changed in settlement assessment background paper but not carried forward to Appendix 7.

## TYPOGRAPHICAL CORRECTIONS

Mod No.	Category	Policy No.	Paragraph No.	Page number	Modification
67	Officer Identified	n/a	n/a	n/a	To replace all Culham 'Road' crossing references with 'River' crossing references throughout the Plan
68	Officer Identified	STRAT1	1	29	Amend final bullet point: Supporting and <del>enhance</del> <b>ing</b> our historic environment.
69	Officer Identified	STRAT2	5	35	The locations and trajectory for housing development is identified in <del>policies</del> <b>policy</b> H1.
70	Officer Identified	STRAT4	6(ii-ix)	40	Renumbering required as there is a duplicate criteria (ii)
71	Officer Identified	STRAT6	4.59	43	The plan proposes alterations to the Green Belt to accommodate our strategic allocations at Culham, Berinsfield, Grenoble road, Northfield and Land North of Bayswater Brook <del>and</del> <b>and</b> Wheatley. These proposals are included at Appendix 4. The individual sections within the plan which are relevant to each of these strategic allocations, provide specific detail on the approach for its release.
72	Officer Identified	STRAT6	2 - 5	43	Renumber paragraph numbers, as written paragraph 2 is missing. Renubmer paragraph 3 to paragraph 2; paragraph 4 to paragraph 3; paragraph 5 to paragraph 4
73	Officer Identified	INF1	7.10	89	Amend para 7.10: To maintain and provide infrastructure and other community services effectively, it is essential that there is a partnership working approach between the public, private and voluntary sector agencies involved. We will continue to work closely with a wide range of infrastructure providers and stakeholders. Key organisations include Oxfordshire county council, <del>the</del> Highways England, the NHS and Clinical Commissioning Group, Town and Parish councils, Thames Water and the Environment Agency. An example of this partnership work is the Oxfordshire Infrastructure Strategy work being undertaken for the Oxfordshire Growth board, which has helped to evidence and map strategic infrastructure requirements for Oxfordshire over the next 15-20 years. This work has assisted in informing our Infrastructure Delivery Plan, which gives more detail on the infrastructure required to support the development proposed in the plan.
74	Gypsy, Traveller and Travelling Showpeople Sites within the Green Belt	H15	5.78	112	...and plots for Gypsies, Travellers and travelling Showpeople that meet the planning definition set out in PPTS (2015). <del>The</del>
75	Officer Identified	ENV2	3	172	Amend bullet: Ecological Networks ( <del>conservation</del> <b>Conservation</b> <del>target</del> <b>Target</b> Areas)

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