

## 22 CENTRAL OXFORDSHIRE

Matter 8E

*This chapter examines the role of and rationale for this sub-region and concludes that insufficient support has been given for economic growth in the strategy. It also raises concerns about the limited range of options tested in the strategy preparation process. It analyses the justification for the level and distribution of housing, and recommends a higher housing level particularly at Oxford to reflect economic, housing affordability and other needs. It finds the draft Plan's approach to Didcot generally sound. It recommends an SDA in south Oxford which will require a highly focused selective review of the Green Belt and joint working between adjoining local authorities. It suggests ways of strengthening the final section of the strategy particularly on transport and partnership working.*

### OVERVIEW AND RATIONALE

- 22.1 The Central Oxfordshire sub-region covers the city of Oxford and the adjoining parts of the surrounding four district authority areas. It includes almost all of the Oxford Green Belt and the towns beyond in north, west and southerly directions.
- 22.2 The sub-region is a new construct within this draft Plan<sup>1</sup>, and its rationale was the subject of debate at the EiP. Most participants saw a logic for this sub-region and we accept that it is needed for the following reasons:
- Oxford city provides higher order services (retail, health, education etc) for its surrounding area, and therefore corresponds to a city region<sup>2</sup>.
  - It has an economic coherence, representing a relatively self-contained labour market area with a high proportion of knowledge and science-based activities both within the city and at various locations around.
  - It is all within one Housing Market Area (Map H6).
  - There is a complementary relationship between the city and surrounding areas which requires joint planning across local authority boundaries.
  - There is a need to elaborate on how the regional policies should be applied to this area.
- 22.3 It could be argued that because these local authorities are used to working together in a county grouping, that there is no need for a sub-region. But if there were no sub-region, the assumption would be that new growth would be accommodated according to a roll forward of previous structure plan policy. In our view however there were sufficient challenges raised in the recent structure plan EiP Panel Report to suggest that a new planning approach to the accommodation of growth in this area should at least be tested. We are not convinced that this testing was done adequately, as discussed in the housing section below.
- 22.4 The delineation of this sub-region is highly diagrammatic. Although it appears to some to be truncated to the east, we consider that it is logical for the sub-region to denote the area intended to act as the focus of new development. For the reasons that we give later in this chapter, we are comfortable that the existing boundary largely

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<sup>1</sup> although the term has been used differently in past structure plans

<sup>2</sup> one of the Functional Urban Regions identified in the Polynet study

does this. GOSE queried why the Upper Heyford airfield appears to have been omitted but we do not see a pressing need for any adjustment<sup>3</sup>.

- 22.5 As elsewhere, we recommend that the challenges facing this sub-region are clearly spelt out at the beginning of the strategy. This would only involve a minor editing of the existing sub-regional characteristics to emphasise the aspects which planning needs to address (E7, para 1.2).

## **CORE STRATEGY (POLICY CO1)**

- 22.6 The strategy pays only scant regard to the integration between this sub-region and those adjoining. Its southern boundary is close to WCBV and in the north east very close to MKAV, in fact the boundaries coincide to the south of Bicester. To the south west, it is also close to Swindon, a principal urban area identified for growth in the draft South West Plan (proposed eastern expansion area). The interrelationships across regional boundaries include transport and water, as well as a need to coordinate growth strategies. We suggest that these interrelationships are acknowledged in the core strategy text which would allow earlier recognition of the Oxford to Cambridge Arc initiative and the regional priority given to the reinstatement of an East-West Rail link<sup>4</sup>.
- 22.7 Policy CO1 is clear in terms of the main criteria relevant to the distribution of housing and economic growth, and the main locations for development, namely the three towns of Didcot, Wantage/Grove and Bicester, and within the built up area of Oxford. It was the content of this core strategy rather than its clarity of expression that was a major subject of the debate at the EiP.
- 22.8 There is general agreement about the need to foster the potential for high-tech innovation in this sub-region (E7, para 1.2, and in the strategy statement in Part C, para 4.6.3). There is also agreement that a high-quality environment is an essential component to quality of life, which in turn gives this sub-region a competitive advantage. It is also crucial to the tourism trade, an important part of the local economy. The source of disagreement is about the scale and distribution of new growth, and the extent of what some of the local authorities term "managed growth".
- 22.9 The character and setting of Oxford city is recognised to be the main environmental asset of this sub-region. Nationally recognised landscape in the form of the Cotswolds AONB clips the north west boundary, and the Wessex Downs AONB clips the southern boundary, but is less an influence on settlement distribution here than in some sub-regions. Of European significance is the Oxford Meadows SAC to the north west of Oxford city, which are subject to potential air quality impacts from increased use of the A34.
- 22.10 The main divergences of views in terms of the spatial strategy is whether economic potential can be fostered to a greater extent by an Oxford-centred strategy or one that distributes growth to the surrounding towns (these were termed "country" towns at the EiP). Those that support growth of the country towns, which accords with previous structure plan policy, pointed to the success of business parks, particularly between Didcot and Wantage. On the other hand Oxford City Council fears damage to its internationally important economy from the level of restraint imposed by the strategy and the University of Oxford says that its competitiveness will be prejudiced.

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<sup>3</sup> Oxfordshire Structure Plan, Policy H2 which makes provision for a new settlement of about 1,000 homes. It was not considered suitable for further growth in the background feasibility study because of its relative remoteness

<sup>4</sup> O2C Arc is currently reflected in Part C, para 4.6.3 and E7, para 2.9, and East-West Rail in E7, para 2.15

- 22.11 At the root of this difference of view is the weight given to the protection of Oxford's setting and the Green Belt that is intended to protect that setting (Policy CO1 iii). Our testing at the regional scale suggests grounds for this sub-region to accommodate a higher level of growth (see Chapter 7). For the reasons given later in this chapter, we consider that a strategic urban extension could be accommodated on the periphery of Oxford without damaging its setting but with significant benefits to the economy and housing affordability. This would be in addition to the proposed level of growth in the country towns.
- 22.12 In revising Policy CO1 to incorporate this parallel growth of Oxford, we also recommend that its tone is made more upbeat reflecting an aspiration to maintain its world-class status. This would reflect a similar sentiment in the equivalent policy for the Cambridge sub-region in the East of England proposed changes. We recognise considerable parallels between the planning issues facing the two cities, despite differences in scale and geography.
- 22.13 We also consider that Policy CO1 could be more explicit about the spatial strategy's aim to improve the self-containment of the country towns, including enhancing their social infrastructure. In spatial terms its supporting text could be clearer on the aim to foster a development axis between Didcot and Wantage/Grove based on its economic strengths and to improve public transport between homes and jobs in the southern part of the sub-region. Overall we contend that our recommendations would strengthen the polycentricity objectives of the strategy, while seeking to accommodate the needs of Oxford city.
- 22.14 As elsewhere we recommend the inclusion of an illustrative strategy diagram. This would need to include the Oxford Green Belt, AONBs, SACs, the named country towns, a proposed SDA (see para 22.72 below), the proposed reinstatement of the Oxford East-West Rail link, as well as railway stations and lines and the strategic highway network.

## ECONOMY

### Job Forecasts

- 22.15 The draft Plan contains a job estimate for monitoring purposes for 2006-16 based on the Assembly's scenario 4 which incorporates the long-term migration trend (E7, para 2.13). On their dwellings based projection (scenario 7), the Regional Assembly now proposes a figure some 90% of this level (16,600). This compares with the Experian trend-based forecast of about 18,000. Although SEEDA was prepared to accept this estimate, because of the national importance of this economy and its status as a Diamond in the RES, we see no reason for adopting a below trend forecast, and would therefore recommend a round figure of 18,000 as the monitoring estimate. This is still considerably lower than the demand-based estimate from the University of Warwick model at nearly 23,000.
- 22.16 Central Oxfordshire has a high proportion of jobs in knowledge-based activities<sup>5</sup> and an innovation rate 67% more than the South East average<sup>6</sup>. The economy includes firms at the cutting edge of manufacturing and in motorsports, as well as those involved in science-based research. Yet the sub-region has performed below the regional average in terms of GVA growth between 1999-2004<sup>7</sup>, and SEEDA stresses

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<sup>5</sup> 43.7% in K1 sectors, SEEDA 8E.1 debate

<sup>6</sup> RES evidence base

<sup>7</sup> SQW in 8Ei.1 debate

that there is no room for complacency. The extent to which the detail of the sub-regional policies matches the aims of the strategy to capitalise on the sub-region's dynamic economy (Part C, para 4.6.3) and to build on its economic strengths (Policy CO1), is discussed below.

## Employment Land

- 22.17 Policy CO5 indicates the target sectors of education, science and technology, and it gives locational guidance for the provision of additional employment land, namely at Bicester and Didcot. No indication of the likely scale of this new employment land is given in the policy or text. It is the policy's expectation that development in Oxford city will be "primarily" on PDL that provoked the strongest reactions at the EiP.
- 22.18 There is no dispute that Oxford is the global brand, and with its two universities has significant potential for spin-off applications. But those who support the policy argue that Oxford should focus on high-tech incubation and start-ups together with its cultural, tourism and retail functions, and that grow-on space and the commercialisation of R&D should take place outside the city. The unknown factor in adopting this position is the extent to which economic activity can be diverted to the surrounding country towns. We are not wholly convinced with this argument, despite the success of locations such as the Milton Business Park west of Didcot in attracting high-tech companies. We note that the principal authority had concerns that some firms were leaving Oxfordshire altogether as they grow<sup>8</sup>.
- 22.19 We are inclined to agree with those participants, including Carter Jonas, who argue that it would be wrong for Oxford to rely primarily on PDL because of:
- the magnitude of the recent loss of employment land to residential uses, a trend that could be expected to continue given housing demands; and
  - the nature of PDL, on the basis that some small sites may not be economic to develop for employment uses, or may not provide the quality to be attractive to science and research-based activities.
- 22.20 There is also numerical evidence that new employment land may be needed in Oxford. A recent employment land study<sup>9</sup> sought to compare likely demand with estimates of available land supply (including the fact that there is only 4-5 years supply of land left at both the Oxford Science Park and the Oxford Business Park), and concluded that between 13.5 ha and 47.5 ha net additional employment land could be needed to 2021<sup>10</sup>. Having tested a range of options, the study found that allocating one of the safeguarded sites on the northern edge of the city<sup>11</sup> would largely meet the lower end of the above scale. Oxford City Council argues that an additional 40 ha may be needed in order to provide necessary flexibility and meet a greater proportion of future demand in the city itself.
- 22.21 From this evidence, we are persuaded that some new employment land could be required within Oxford to avoid undue constraint on economic potential there. To our mind it would be less risky for the sub-regional strategy to acknowledge that a range

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<sup>8</sup> Additional advice to SEERA on employment forecasts, para 30, Annex to formal submission, December 2005 [SEP16]

<sup>9</sup> Oxford Employment Land Study, Final Report, Nathaniel Lichfield and Partners for Oxford City Council, March 2006 [Es3]

<sup>10</sup> based on a business as usual scenario without any flexibility and any higher growth scenario with a flexibility allowance respectively, Table 7.5

<sup>11</sup> of which the Peartree site (17 ha) is said to have the best strategic road access

of employment opportunities will be needed in both Oxford and the country towns. The precise scale of new land in Oxford should be determined through the LDF.

- 22.22 Turning now to the two country towns identified in the policy, it is apparent that they have very different economic characteristics. Bicester does not yet have a market profile for high-tech activity and already has a relatively large land supply<sup>12</sup>. Nevertheless we accept the objective of promoting it as a location for spin-off activity as part of the Oxford to Cambridge Arc, and that additional economic activity here would help to reduce its current dormitory function. We were told that progress is at last being made on a business park and hotel to the south west of the town but that the market was fragile. It must therefore be recognised that any further releases of employment land on the northern edge of Oxford, besides the safeguarded site at Peartree, could be adversely competitive to Bicester's aspirations.
- 22.23 It was generally accepted that there is scope for intensification of uses at the successful Milton Business Park, west of Didcot. From monitoring information there appears to be considerable committed employment land in Didcot anyway<sup>13</sup>. No evidence was provided to suggest a particular need for additional land releases.
- 22.24 Given this situation we recommend that Policy CO5 is redrafted to indicate the positive objectives being sought at the named locations, rather than emphasising the distinction between a promotional stance at Bicester and Didcot, compared to a restrictive policy at Oxford. There would be no need in our view to restate the objective of making best use of PDL since this is already included in Policy CO1, the core strategy. In respect of the country towns, our suggested emphasis would be on:
- stimulating growth at the established research and business parks between Didcot and Wantage/Grove. This would acknowledge the potential at the Harwell Campus, in addition to intensification opportunities at Milton Park.
  - promoting Bicester as a new location for higher value and knowledge-based businesses in association with the Oxford to Cambridge Arc.
- 22.25 In respect of Oxford, Policy CO5 could acknowledge that some new employment land in addition to the safeguarded land may be needed, but that the objective should be to avoid worsening the jobs-housing imbalance. Such new land may be needed to give a range of opportunities, including the necessary quality of business site and/or in substitution for employment land lost to housing. In any event the policy should not unduly constrain the ability of such issues to be tested in detail at the LDF stage.
- 22.26 This sub-regional strategy is silent on the degree of protection to be afforded to existing employment land, although we note from the Oxford Employment Land Study that nearly 40 key sites are already protected through the Oxford City Plan. The provisions of Policy RE2 would therefore apply, and we are content that as amended this would allow for substitution of new land where existing land is found to be no longer appropriate for modern business.

## **Balance between Labour Demand and Supply**

- 22.27 Central Oxfordshire already has a higher number of jobs than resident workers. At 2006 this amounted to some 34,000, although we accept that the relationship is more balanced for the whole of Oxfordshire. Unlike in the WCBV and London Fringe, this excess of jobs over labour supply is not anticipated to worsen significantly between

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<sup>12</sup> 30 ha at April 2005, Oxfordshire Land Development Progress System extract [CO28A], which we were told was equivalent to about 15 years supply although the Gavray Drive site was recently lost on appeal to housing

<sup>13</sup> 58 ha at April 2005 [CO28A]

2006-16 on the Assembly's projections consistent with the draft Plan's housing levels<sup>14</sup>. Indeed SEEDA considered that with higher economic activity rates, there might be a rough correspondence between new jobs and new labour supply for the first 10 years of the plan.

22.28 Three concerns remain in our minds however:

- the scale of the imbalance at the beginning of the plan period given that this is one of the smallest sub-regions, and that it is forecast to worsen over the second half of the plan period;
- the fact that it adjoins the Western Corridor and Swindon areas southwards, and Milton Keynes to the north east, all of which are also areas of net in-commuting;
- the concentration of the imbalance within Oxford city.

22.29 At the sub-regional scale, this imbalance raises questions about the source of any additional in-commuters, given that there are no surrounding labour markets other than to the north, from which this could easily happen. SEEDA also pointed to the risk that new labour supply arising from new housing at Didcot and Wantage/Grove could be sucked into the neighbouring Western Corridor/M4 corridor given the economic growth forecasts and overlapping housing market areas.

22.30 We discuss the implications for Oxford city from a housing perspective below, but the outcome of our recommendation would contribute to improving the imbalance in the city.

## Smart Growth

22.31 The particular aspects that appear to relate to this sub-region, which we suggest should be explicitly identified in the text to Policy CO5 are:

- using existing employment land as efficiently as possible;
- promoting the commercialisation of R&D outputs;
- upgrading the skills of those least qualified, including basic literacy and numeracy<sup>15</sup>. This need is reflected in recruitment difficulties being experienced at the lower end of the job market;
- increasing economic activity rates particularly in Oxford city.

## SETTLEMENT SHAPING

### Green Belt

22.32 We support the functions of the Oxford Green Belt as set out in Policy CO3. We have taken account of the history of the Green Belt<sup>16</sup>, and the conclusions of the EiP Panels and Secretaries of State in the late 1980s/early 1990s that growth of Oxford should not continue indefinitely. However the most recent EiP Panel envisaged that it was "inevitable" that future plans would need to address new spatial options including those that involve making changes to the Green Belt. This was within the context of meeting needs beyond 2016 or if higher housing levels were required through the South East Plan.<sup>17</sup>

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<sup>14</sup> additional 3,000 excess jobs 2006-16, but a further 12,000 excess jobs 2016-26

<sup>15</sup> as advised by the Oxfordshire Economic Partnership in 8Ei.2 debate

<sup>16</sup> usefully summarised in SODC's statement, Appendix 2, Matter 8Eii

<sup>17</sup> Oxfordshire Structure Plan 2016, EiP Panel Report, paras 1.7, 2.28 and 4.11

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- 22.33 As discussed later we are concerned that options for a higher level of growth were insufficiently tested in this sub-region, and hence that the need for a strategic or selective review of Green Belt was sidestepped.
- 22.34 The issue for us is whether the Green Belt has overly constrained the spatial strategy, and whether there are exceptional circumstances at this point in time which justify a review of the Green Belt. We believe that there are, for the reasons given in paras 22.58 - 22.65 below.

## **Influence of Transport, Water Supply, Waste Water Treatment and Flood Risk**

### **Transport**

- 22.35 Despite explicit recognition of the need to concentrate development where car travel in particular can be reduced (Policy CO1 v)), several participants expressed concern that transport has not been given sufficient weight in shaping the proposed spatial strategy. The most fundamental issue is the capacity of the A34 which is used for work journeys between settlements within this sub-region, as well as for longer distance traffic between Southampton/Winchester and the West Midlands. Stress levels are forecast to be amongst the highest in the region, and the HA sees little chance of it being widened<sup>18</sup>.
- 22.36 Most participants agree with the generality of the principle that housing should be co-located with employment as far as possible in this sub-region. However this same argument is used by those that argue for growth of housing in the country towns to make them more self-contained, by those that argue for an urban extension of Oxford, and by Terence O'Rourke who argues for a new settlement located away from the A34 corridor altogether.
- 22.37 Our conclusion is that transport issues were very much in the mind of the principal authority in preparing the strategy. But because the testing of the alternative settlement options was relatively superficial, there was no comparative assessment of transport impacts, e.g. through a sub-regional traffic model. Intuitively though we would argue that allocations at and around the regional hubs have the most chance of maximising opportunities for sustainable travel. In our view the extent to which new growth will realistically maximise the use of public transport has been downplayed. The objectives in the latter part of E7, para 2.2 do not seem to be carried through into the new housing provisions.
- 22.38 Further discussion of the influence of more local transport issues on housing distribution, including the district apportionment at Didcot, is included in the housing section below, and on transport priorities is included in the final section on implementation.

### **Water Supply**

- 22.39 New water sources will be required in the later part of the plan period to support growth in this sub-region and in neighbouring Swindon. Thames Water has a preferred package of measures, but there are different views on the extent to which demand management and water efficiency measures should be relied upon. The issue is complicated by the fact that the major element in their package, the Upper Thames Reservoir, is designed to meet London's needs to a greater extent than local needs.

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<sup>18</sup> HA Document 3, para 8.3.12

Because of this inter-regional dimension we have reported on how an Upper Thames Reservoir should be included in this RSS in Chapter 10 (Policy NRM2). Assuming that a new supply is provided, there is no suggestion that it should be an influence on distribution of new housing growth within the sub-region.

## **Waste Water Treatment**

22.40 There are no overriding constraints in terms of the water quality of receiving waters from WWT works, unlike in some other sub-regions. Hence although there is a need for local upgrading of WWT facilities, e.g. a capacity upgrade at Didcot STW, additions to the sewerage network e.g. at Grove, and the need for Oxford and Bicester STWs to meet stricter discharge consents, the EA confirmed that such works were within current technological feasibility.

## **Flood Risk**

- 22.41 The EA identify Didcot, Oxford and Bicester as at risk of fluvial flooding. In respect of Didcot, we are satisfied that SFRA work has been undertaken to inform the proposed district apportionment between South Oxfordshire and Vale of White Horse, including the effects of increasing housing levels here as a NGP.
- 22.42 Although SFRA work has not yet started for Oxford, we were told by the City Council that as flood risk only affects parts of the city it has sufficient options to meet the housing level proposed by the sub-regional strategy, and more.
- 22.43 SRFA work is underway in Cherwell and the District Council consider that they have sufficient options at Bicester to accommodate the proposed housing level there.
- 22.44 Surface water runoff is an issue at Wantage/Grove because of natural drainage difficulties and we understand that the District Council have undertaken work on this in taking forward their Local Plan allocation at Grove airfield.

## **HOUSING**

### **Overall Level**

- 22.45 Policy CO2 sets a housing level of 34,000 (1,700 dpa) between 2006-26. This is some 5% below recent structure plan levels on a whole district basis, despite the recent EiP Panel making clear that they saw these levels as the absolute minimum of housing needed<sup>19</sup>. Oxfordshire CC claims that it is a proportionate response, providing for growth in the economy but balanced with concerns from an infrastructure backlog and environmental constraints. Oxford City Council and developer representatives consider the proposed provision to be an inadequate response to the economy and housing affordability issues, particularly in Oxford city, and to recent household projections and the Government's aspirations for a step change in housing supply. Alternative housing levels up to 67% or more were suggested.
- 22.46 Since the draft Plan was submitted, South Oxfordshire in respect of Didcot, and Oxford, have been awarded New Growth Point status. In the case of Oxford, the City Council's current trajectory for 2006-16 is just over 2,000 above the draft Plan's average rate<sup>20</sup>. From the debate it appeared that part of this represented a bringing

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<sup>19</sup> Oxfordshire Structure Plan, EiP Panel Report, para 3.11, December 2004

<sup>20</sup> Updated summary of New Growth Point Dwelling Numbers versus draft SEP (2006-2016 only), February 2007 [GOSE3A]

- forward of housing from the second half of the plan period, but part was a net increase on Policy CO2 levels.
- 22.47 For Didcot the NGP proposals represent a net increase of 1,500. The way in which this is intended to be apportioned between South Oxfordshire DC (SODC) and Vale of White Horse DC (VWHDC) is complicated in timing terms, but over the whole plan period would result in an additional 750 dwellings to each district (see para 22.84 below).
- 22.48 The net effect of these NGP adjustments would be an increase of some 2,500 (+ 250 dpa) bringing the sub-regional total to about 36,500 (1,825 dpa). For the whole of Oxfordshire this is roughly equivalent to the recent structure plan and RPG9 level.
- 22.49 As a partial offset VWHDC seek a decrease in their Central Oxfordshire housing figure by 1,000, of which 300 would be transferred into the rest of the county allowance. This is on the basis that it would be difficult to find the amount of new land required in and around their other settlements, such as Abingdon. We have some sympathy with this position given that Didcot and Wantage/Grove are intended to be the foci of growth in this district. We also note that, despite recent completions for the district as a whole being lower than that required in the last structure plan, this is the only Oxford district proposed to take an increase under the draft Plan (GOSE2). We therefore recommend that the Vale of White Horse figure in Central Oxfordshire outside Didcot is decreased by 1,000. (We consider the rest of its district in Chapter 26).
- 22.50 For the reasons summarised in Chapter 7 we consider that a housing level for this sub-region of 40,100 (2,005 dpa) would better reflect regional imperatives and local considerations, particularly the needs of Oxford city. In terms of regional imperatives it seems wholly wrong that this sub-region with its undoubted economic potential should make significantly less notional allowance for in-migration than the regional average. Indeed we are surprised that there appears to have been so little attempt to understand demographic inputs in preparing the strategy.
- 22.51 Oxford City Council provided extensive data to illustrate their backlog of housing needs, housing affordability problems, and the recruitment and retention difficulties being experienced by local employers and public services, including the hospital and both universities. 40% of the sub-region's job growth would also be expected here on trend forecasts, according to SEEDA. In the light of this it appears ironic that the proposed housing level for Oxford in the draft Plan is about 20% below RPG9 levels.
- 22.52 In our view a more transparent approach should have been taken in preparing the strategy to testing higher growth levels. Although the consultation draft Plan purports to test RPG9 +25%, the spatial implications of this were not described, and an invitation at the end of the section for consultees to comment on higher levels could easily have been missed. Nor were the environmental and socio-economic effects of this higher growth level included in the SA, September 2004.
- 22.53 We see no reason why our recommended higher housing levels cannot be accommodated while still respecting the environmental assets of this sub-region, including the character of Oxford and the attractiveness of the countryside. In this respect we note that following their testing of alternative growth levels, GOSE's consultants identified this sub-region as being one of the four with the most potential for growth<sup>21</sup>. We consider that it is better for the Plan to be clear about a realistic

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<sup>21</sup> Augmenting the Evidence Base for the EIP of the South East Plan, para 57, Roger Tym and Partners and Land Use Consultants, May 2006 [Sr3]

housing level so that infrastructure providers can build this into their programmes, rather than repeatedly over-providing against plan levels as has been the case in Oxford recently.

## Housing Distribution (Policy CO2)

- 22.54 This sub-regional strategy is commendably explicit about the proposed levels of growth assumed for Bicester, Didcot, and Wantage/Grove (E7, para 2.4). This is where the strategy envisages most of the new greenfield land would need to be found. The principal authority defends the choice of these towns in that they are close to employment locations, well related to transport networks and relatively unconstrained physically. Several participants criticised this approach as being too much of a roll forward of the country town's strategy found in previous structure plans, despite a warning in the recent EiP Panel Report at para 2.27 that beyond the structure plan period, i.e. post 2016, this may have "run its course".
- 22.55 We agree with these criticisms insofar as there appears to have been only a very cursory comparison of spatial options, and seemingly no consideration of an SDA as required in SEERA's original brief. Despite a more Oxford focused strategy being supported by the City Council and two local authorities, the options included in the public consultation in autumn 2005 were only minor variations of the country town's strategy with and without Wantage/Grove. The leaflet did allow for suggestions on alternative strategies, and it is significant that a majority of responses favoured more development at Oxford<sup>22</sup>.
- 22.56 The option of a new settlement received even less consideration. Although it featured in the April 2004 sub-regional study it was dismissed in October 2004 on the basis that there was little prospect of developing one that did not "impinge on existing settlements"<sup>23</sup>. This hardly seems robust given that the same reason could be given against any of the options. Nor did a new settlement ever feature in any SA testing. A variety of new settlement proposals were put to us including those outside the Green Belt in an eastern direction (around Milton Common) and to the north (around Weston on the Green), and on brownfield land inside the Green Belt to the north at Shipton on Cherwell. Terence O'Rourke asserted that a major benefit of the eastern option was that it was located away from the A34 corridor, although we would have concerns that a location close to the M40 could increase car commuting towards London. Although there would be a different pattern of environmental and socio-economic impacts, on balance we consider that an urban extension at the regional hub itself would provide a more sustainable solution, particularly on travel patterns.
- 22.57 We have already made it clear that we do not consider that the needs of Oxford city are sufficiently recognised in the draft strategy. But because we see a need for increasing the sub-regional housing total it is not a case of redistributing the draft Plan's housing levels between districts, but of adding additional growth for Oxford on top. We do not consider that this additional growth at Oxford would necessarily harm the chances of the country town is becoming more self-contained – an objective that they are “on the cusp” of achieving, according to Oxfordshire CC.

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<sup>22</sup> 56% (1700 of 3000 responses), as quoted in Savills statement Matter 8Eii.3

<sup>23</sup> Oxfordshire CC Executive Committee, para 36, October 2004 [CO17]

## Oxford

### *Case for a Green Belt Review*

- 22.58 The City Council has undertaken further work since the draft Plan was submitted and on the basis of extant planning permissions, adopted local plan allocations, windfall estimates and a NGP allocation in the West End, it is anticipated that it can provide nearly 5,700 dwellings by 2016. If its housing level remained at 7,000, there would be a dramatic slowdown in the second half of the plan period. The City Council's advice is that an additional 5,000 (250 dpa) should be accommodated in or close to the City. From its LDF preferred options work it estimates the capacity of its safeguarded land at between 500-2,000 dwellings, depending on how much may be needed for employment purposes. Implicit in the Council's thinking however is that a major element of any longer term solution would need to be an urban extension.
- 22.59 Having examined all the evidence before us, our own views accord with those of the City Council that an urban extension will be required in the longer term. This will inevitably mean a review of Green Belt boundaries. We do not come to this conclusion lightly. We are fully aware of the value placed by local residents on each part of the Green Belt, of the functions that it fulfils particularly in protecting the landscape setting of this historic city, and the policy intention that Green Belts are permanent.
- 22.60 However we believe that there are **exceptional circumstances** to justify a Green Belt review in terms that would satisfy PPG 2, para 2.6. First in addition to the regional imperative for a higher sub-regional housing level, there are indicators of need that are specific to Oxford:
- significant potential within nationally important science, technology and education sectors;
  - a significant excess of jobs already over working population;
  - staff recruitment and retention problems reported by key businesses and public services;
  - housing affordability ratios in excess of the regional average;
  - some of the highest house prices in the region;
  - a large backlog of housing need;
  - worsening traffic congestion.
- 22.61 Secondly in terms of alternative settlement patterns, we have no reason to question the urban potential estimates for Oxford assumed within the draft Plan and we believe that there are limits to the extent that significantly more development could be accommodated within the urban fabric, without damaging the special character of the city and putting pressure on its green spaces. It will also be difficult to provide an appropriate mix of dwelling sizes including family accommodation if limited to urban infill and redevelopment<sup>24</sup>.
- 22.62 Thirdly opportunities for development beyond the Green Belt have been thoroughly reviewed in preparing this sub-regional strategy, and such potential as has been identified would still be included in RSS. Nevertheless there could be dangers in further "jumping of the Green Belt", as illustrated not just in debates at this EiP but

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<sup>24</sup> Over 90% of recent development has been in 1-2 bed units and some 75% at over 50 dph, Oxford City Council, Matter 8Eii.3 debate

also in the recent national review of the planning system where Oxford was used as a case study<sup>25</sup>.

- 22.63 The implications for sustainable development including the effects on car travel of channelling development beyond the outer Green Belt boundary are also recognised as a legitimate factor in considering inner Green Belt boundaries (PPG2, para 2.10). In this context we note that residents of Didcot, Bicester and Wantage have longer journeys to work than those in Oxford, and that they are less likely to travel to work by bus. This comparison still holds good when the southern wards of Oxford are analysed separately<sup>26</sup>. We find these statistics giving absolute flows at 2001 more persuasive than the time series indicator that the proportion of those living in the country towns but working in Oxford has reduced slightly between 1991 and 2001. We are not convinced that a major new settlement outside the Green Belt could be sufficiently self-contained as to outweigh the advantages for sustainable travel of an extension of the regional hub.
- 22.64 Although the advantages and disadvantages of growth at Oxford compared to further growth at the country towns has not been formally documented in any detail, we are confident that sufficient evidence is available within the EiP documentation to justify this comparative strand of the exceptional circumstances test.
- 22.65 The City Council advocate that the next steps should be a strategic Green Belt review<sup>27</sup>. We are concerned about the potential for yet more delay if we were to recommend this. It could also cause needless worry to residents, as illustrated by the concerns voiced by the Oxford Green Belt Network on behalf of many village communities, that any form of Green Belt review would be opening a "Pandora's box" with the risk that the whole Green Belt would become vulnerable. In our view a highly focused, selective Green Belt review would be preferable given the amount of evidence already amassed.

#### *Preferred Location*

- 22.66 This is not the first time that an urban extension to Oxford has been considered. Two locations were identified to have the least impact on the integrity of the Green Belt in background work for the recent structure plan<sup>28</sup>: on the south side (south of Grenoble Road) and to the north west (between Kidlington and Yarnton). The former was included in the deposit draft structure plan, September 2003, but was withdrawn in pre-EiP changes on the basis that it was not needed as further urban capacity had been identified within Oxford.
- 22.67 We were presented with two very full analyses of the Green Belt<sup>29</sup>, which result from site work and review of previous studies including a detailed landscape character assessment undertaken for the Countryside Agency in 2002. This earlier work suggested that the Clay Vales contribute the least of the eight landscape types to the distinctiveness of Oxford's setting. Both recent studies examine the functions of the Green Belt in detail, taking account of a range of factors including viewing cones, hills, floodplains, settlement gaps, ecology, heritage, and the ability of the landscape

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<sup>25</sup> Barker 2 Review of Land Use Planning Interim Report, Box 8.3 and para 6.56, the Barker team for Treasury and CLG, July 2006 [En5]

<sup>26</sup> DLA statement, paras 1.12-1.14 for 2001 Census results, Matter 8Eii.3

<sup>27</sup> Oxford City Council's Matter 8Eii.3 statement gives their suggested review criteria

<sup>28</sup> Oxfordshire Structure Plan 2016, Deposit Draft, Feasibility Report, pages 17-19, Oxfordshire CC, 2003

<sup>29</sup> Review of the Oxford Green Belt, Colin Buchanan for Hallam and Bloor, June 2006 (rep 8127) and Development around Oxford, Environmental and Landscape Considerations, Faulks Perry Culley and Rech for Magdalen College, Oxford and Thames Water Property, June 2006 (rep 8150)

- to absorb development. Both studies produce composite maps that confirm that the two areas identified in structure plan feasibility work are amongst the least constrained.
- 22.68 Various conceptual proposals were submitted by developers and landowners in each of these locations. This allowed us to visualise how potentially developable land would relate to existing infrastructure and employment opportunities within the city, and to surrounding villages within the Green Belt.
- 22.69 Of the two locations we have a strong preference for the southern edge of the city because:
- it could more easily be integrated with existing city public transport systems;
  - it is closer to employment sources, including the Oxford Science Park, Oxford Business Park, and BMW;
  - any potential employment component in a mixed use scheme would provide less competition with Bicester (see para 22.22 above), although it is not at this stage clear that more employment land would necessarily be required (see para 22.25);
  - there would be less risk of coalescence with surrounding settlements than between Kidlington, Yarnton and Begbroke<sup>30</sup>);
  - it was the selected location in the deposit draft structure plan.
- 22.70 Initial work by developers confirms that there is a viable proposition for an urban extension of at least 4,000 on the south side of Oxford, sufficient to support a secondary school, despite the need to relocate utilities infrastructure. In relation to the north west option the University of Oxford indicated that they are no longer pursuing their original mixed use proposal based around their Begbroke Science Park<sup>31</sup>, but are instead expanding within the city.
- 22.71 We have reviewed the evidence submitted by SODC<sup>32</sup> that an urban extension on the south side of Oxford would exacerbate existing traffic problems, despite the assumed incorporation of bus route extensions and a park and ride site. Uncertainties are acknowledged within the report that the relevant land was at the extreme edge of the model area. Nevertheless we accept that access is currently poor and that more detailed transport impact appraisal would have to be undertaken in subsequent work.

### *Next Steps*

- 22.72 The boundary between Oxford city and South Oxfordshire runs through the area immediately south of the city, and it is therefore vital that the RSS gives a clear steer to the need for joint working. We therefore recommend that a southern extension of Oxford is indicated as an SDA on the Key Diagram, and that Policy CO3 is amended to indicate that a selective review of Green Belt boundaries will take place there. If the Secretary of State is minded to accept this recommendation, its implications will be tested through an SA and AA of the proposed changes, which in turn will be subject to full public consultation. By the time that the RSS is adopted there should be sufficient confidence for Oxford City Council and SODC to move straight to a joint Area Action Plan (AAP), if they have completed their LDF core strategies by then.
- 22.73 We assume that a strategic overview of the southern edge of Oxford would provide a first step in this process in order to identify the most appropriate land for development with the least harm to Green Belt functions. The joint AAP or other joint LDD would

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<sup>30</sup> Oxfordshire Structure Plan 2016 Feasibility Study para 35, September 2003 [Ss3]

<sup>31</sup> Masterplanning and impact studies submitted by Turnberry for the University of Oxford [rep 8076]

<sup>32</sup> SE Plan EIP - Grenoble Road, Halcrow for Oxfordshire CC, January 2007 [SOXDC2]

document the very special circumstances that justify taking land out of the Green Belt. It would also identify additional safeguarded land to ensure that Green Belt boundaries endure over the long term, as well as providing a conceptual masterplan of the form of extension envisaged. Such a process would be subject to public consultation and examination.

- 22.74 We are confident that the local authorities will wish to involve representatives of the surrounding village communities in drawing up their proposals, so that they can contribute to the design of landscaping and green infrastructure to maintain their village identities. Although we sympathise with the fears of the Baldons PC and residents of Garsington<sup>33</sup>, we have no reason to doubt that a satisfactory masterplanning solution could be achieved.
- 22.75 Pending the completion of more detailed work, we recommend showing a notional allowance of 4,000 dwellings for a south Oxford SDA in Policies CO2 and H1, together with an appropriate footnote to indicate the cross boundary implications. We also recommend adding 1,000 dwellings to Oxford city's level to incorporate any net addition that arises from its NGP status, which we support, and any limited additional urban intensification. This should allow sufficient scope for a sustainable urban extension (of around 4,000) to be planned and implemented by 2026. Whether there is further potential for expansion beyond this will no doubt be tested during the AAP work.
- 22.76 Because of the sensitivity of the subject matter, we urge GOSE to stimulate and monitor progress on this AAP.

### **Didcot (South Oxfordshire and Vale of White Horse)**

- 22.77 A guideline figure of about 7,300 dwellings at Didcot is given, about 3,000 of which would be in the second half of the plan period (E7, para 2.4 and Policy CO2 footnote). Since then a further 1,500 dwellings is expected as a result of NGP status (see para 22.47 above). We are largely supportive of this growth at Didcot given that it is well connected by rail and is close to business parks and research centres with growth potential, and because of the willingness to collaborate by the adjoining local authorities with other delivery agencies and developers. However there will be challenges on a number of fronts as discussed below<sup>34</sup>.
- 22.78 We were impressed with the thoroughness of the background work which was designed to inform the apportionment of the longer-term dwellings allocation in Policy CO2 (3,000 dwellings). This covered landscape appraisal, SFRA, agricultural land classification, local traffic modelling, and a brief SA for 9 separate sites, together with public consultation<sup>35</sup>. The process was made more complicated though by the acceptance of South Oxfordshire's bid as a NGP which means delivery of an additional 1,500 dwellings. The same background work was clearly intended to demonstrate to us that this could be accommodated, although the only explicit recognition of a partial increase in housing numbers was in the final traffic modelling work.

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<sup>33</sup> Letters sent as a result of a public meeting held in December 2006, appendix to Garsington Parish Council statement Matter 8Eii

<sup>34</sup> Western Villages Alliance statement Matter 8Eii.4 contains a useful summary of constraints

<sup>35</sup> Didcot Area Housing – Meeting the Regional Requirement, SODC, VWHDC, Oxfordshire CC, December 2006 [CO33] together with mapped information attached to Oxfordshire CC Committee report, January 2007 [CO30]

- 22.79 From our interpretation of the background material, we are content that there is sufficient land identified that could accommodate this larger dwellings figure, although there are clearly challenges in terms of infrastructure and phasing.
- 22.80 We were led to believe that existing commitments are sufficient to meet the initially assumed dwellings total up to 2016, and hence the debate centred around whether it was possible for the town to deliver and assimilate a further 1,500 dwellings as a result of the NGP, and a longer-term growth of 3,000.
- 22.81 Residents groups, whether they were for or against additional expansion of Didcot, were unanimous about infrastructure shortages in the town as a result of past levels of growth. This included town centre and leisure facilities, tertiary education, together with pressing issues relating to transport. The traffic modelling studies predict that with the currently committed level of housing development and infrastructure, the road network will be at capacity by 2016. Key to unlocking subsequent development will be the Harwell bypass. This will enable a link to be made from the western part of the town on to the A417 and across the A34, opening up access to the Harwell Centre and enabling an alternative access onto the A34 avoiding the congested Milton interchange. A northern extension of the Harwell bypass would enable a connection from the western part of the town on to the A4130 with access to the Milton Business Park, collectively termed the Western Link Road. VWHDC was confident that funding sources had largely been identified for the Harwell bypass.
- 22.82 Didcot has a poor record of recent housing delivery. We were told that this arises from delays to existing commitments on the north east and western edge of the town, but that the large Great Western Park would begin delivery in 2008/09 with a 9 year buildout. The highest completion rates achieved by Didcot have been in the mid-1990s at over 400 dpa. SODC was confident that this could be improved given that they were now seeking a much higher proportion of affordable housing, which opens up another occupancy sector. Research commissioned by them suggests that an annual rate of 500-600 dpa might be achieved, and that even 900 dpa might be possible, as would be required to achieve the trajectory implied in the NGP numbers. We agree with Didcot Town Council and others who considered this to be unrealistically ambitious, and doubt the comparability of Swindon and Milton Keynes used as benchmarks in the study<sup>36</sup>. Nevertheless SODC have agreed with GOSE that frontloading of housing provision within the rest of their district could meet the terms of the NGP status, and it is not for us to question these administrative arrangements.
- 22.83 Despite our concern about delivery rates in the short term, we consider that NGP status would have longer-term benefits here. The amount of growth proposed for Didcot by the draft Plan and NGP proposals would almost double its current size according to the Western Villages Alliance. In the absence of a Local Delivery Vehicle, we consider that NGP status will bring valuable access to outside expertise, pump priming funds for new initiatives and studies, and hopefully some capital contribution to new infrastructure.
- 22.84 The outcome of the site analysis and infrastructure phasing considerations is that land in South Oxfordshire is more likely to be used to accommodate the additional 1,500 dwellings under the NGP up to 2016, whereas a greater proportion of the longer-term growth is likely to be in Vale of White Horse<sup>37</sup>. However an equal split of both elements is envisaged. Since Policy CO2 does not distinguish phasing, the original

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<sup>36</sup> Assessing the amount of growth that Didcot can accommodate to 2026, Knight Frank for South Oxfordshire DC, January 2007 [SOXDC1]

<sup>37</sup> SODC and VWHDC letters to GOSE, 22 February 2007 attached to Summary of NGP Dwelling Numbers [GOSE3A]

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50/50 split between the two districts still remains, but we recommend that each of these figures is increased by 750 to take account of the new NGP, and the footnote is now deleted. We further recommend that a summary of the phasing implications of Didcot's growth between the two adjoining local authority areas, together with the intention to operate a pooled system of development contributions to fund the Harwell bypass and its northern extension is given in the accompanying text.

- 22.85 We welcome ongoing work that is seeking to integrate Didcot with Wantage/Grove and intervening employment opportunities to the west. A Southern Quadrant Partnership including the two local authorities and SEEDA is seeking to strengthen this southern economic growth area. A similar geographical area is covered by an ongoing integrated transport study. We have already suggested that this development axis is identified more clearly in the spatial strategy for this sub-region.

### **Wantage/Grove (Vale of White Horse)**

- 22.86 A guideline figure of about 3,400 dwellings at Wantage/Grove is said to be assumed in Policy CO2 (E7, para 2.4). We support this allocation, primarily because of its interlinkage with Didcot and areas of employment growth potential<sup>38</sup>, as identified above. The allocation is a sizeable increase on a relatively modest settlement (Wantage had a population of about 10,500 in 2001), and the implied build rate has not been equalled since the late 1970s. But the District Council confirmed that about 75% of this capacity is accounted for by a single site already in their Local Plan, for which an application is expected this year, and which would fund the Grove northern link road. We see no case for increasing this guideline figure, particularly as it is the only named settlement without a rail station, a situation which appears unlikely to change. But it does have the merit of being less dependent on the A34 corridor than Didcot or Bicester.

### **Bicester (Cherwell)**

- 22.87 Policy CO2 is said to assume a guideline figure of about 4,300 dwellings at Bicester (E7, para 2.4), which is a town of about 29,000 population. This continues the recent rate of completions of about 200 dpa in this town. We support this housing level and acknowledge the partnership work being undertaken to improve the town's infrastructure, its centre and its employment offer. It is very dependent on out-commuting, including the use of the Chiltern Line into London. Until it becomes more attractive to new sources of economic activity, as is the objective of the strategy, we see no case for increasing this guideline figure.

### **Rest of Central Oxfordshire (including Witney, West Oxfordshire)**

- 22.88 In accordance with Policy CO1, outside the main locations of Oxford, Bicester, Didcot, Wantage and Grove, limited development will be permitted to support the social and economic well-being of local communities. Policy CO2 implies that 12,000 dwellings (2006-26) will be allocated to these other areas. With the exception of VWHDC the District Councils are generally content that this apportionment would make adequate provision for sustainable development in these parts of the sub-region while respecting the environmental and policy constraints. We were reminded that much of the area outside Didcot is in the Green Belt.

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<sup>38</sup> 2,200 additional jobs are expected to 2026 by the Harwell Campus Site Organisations, on top of the current 4,600 jobs, Matter 8Ei.1statement

- 22.89 In VWHDC about 1,300 dwellings would be required on greenfield sites outside the main locations. As we have set out above, we are sympathetic to the Council's view that this would place unsustainable pressures to extend small rural settlements and we have therefore agreed to their request to reduce their proposed housing level in the sub-region outside Didcot (see para 22.49).
- 22.90 Developer interests, on the other hand, are not satisfied with the implications of Policies CO1 and CO2 for other towns in the sub-region. We heard arguments that Witney (23,000 pop approx<sup>39</sup>) should be recognised for its potential for higher levels of growth, taking account of its existing good level of employment and higher order services and the advantage of reducing pressures on the A34 corridor. It was also suggested that more employment growth at Witney could sustainably encourage east to west movements along the A40 by using spare capacity on the high quality Oxford to Witney bus link.
- 22.91 We recognise that Witney's status as a main location under Policy H1 of the Oxfordshire Structure Plan is not replicated in the draft Plan. This is reflected by the reduced allocation for West Oxfordshire district as a whole compared with RPG9 (335 dpa compared with 453 dpa) and by the level of 160 dpa proposed for the sub-regional part of the district. Net completion rates 2001-06 have averaged 554 dpa. As a result, there are fears that current rates of housing completions will fall dramatically in the middle and later phases of the Plan period and that reserve site provision to the west of the town will be unnecessarily held back. Also, Barton Wilmore argued that the stock of employment land is too low.
- 22.92 However, we are not convinced that there is a case for a much higher rate of growth at Witney as a means of relieving pressure on the A34 corridor. Witney's historic core has serious traffic constraints and the A40 link with Oxford suffers heavy congestion. We do not consider that these problems are likely to be overcome by a shift to public transport and we would have concerns about the implications of diverting scarce resources from the necessary investment in the A34 corridor. Increased self-containment of the town would be beneficial but there is already a broad balance between the number of economically active residents and jobs. We heard little about future needs for employment land but have no reason to doubt that existing commitments and regeneration of existing sites will be adequate to meet needs.
- 22.93 We do nonetheless have concerns that the proposed housing provision figure would unnecessarily constrain the market in Witney, and in our view a small uplift in the figure would enable a sustainable level of growth to be maintained in the town. This would increase the opportunities for affordable housing provision and give flexibility to respond to growth in the local economy and would make use of land that has already been identified for longer-term growth. As a result, we suggest that the district's sub-regional component should be increased from 160 dpa to 190 dpa, an increase of 600 dwellings, but do not consider that this justifies a specific reference to Witney in Policy CO1.
- 22.94 We agree with the District Councils that having regard to the capacity and the constraints affecting the other small towns in the sub-region such as Abingdon, Eynsham, Faringdon, Wallingford and Woodstock, it would not be justified to make any further amendment of the implied provision level for these areas.

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<sup>39</sup> As at 2001. Source: Oxfordshire County Council.

## **Flexibility on Housing Levels between Central Oxfordshire and Rest of County**

22.95 As part of the general debates on housing levels in Oxfordshire, the District Councils pressed for flexibility to be built into the sub-regional policy framework to accommodate the housing requirement in the most sustainable manner, irrespective of the sub-regional boundary. We have referred above to the particular case of VWHDC where we agree to a re-distribution for these reasons, but as set out in our consideration of the Rest of Oxfordshire (Chapter 26) we do not find sufficient reason to adopt a flexible approach generally to the split districts here.

## **Affordable Housing**

22.96 Policy CO4 states that at least 50% of all new housing should be affordable. This is the highest level sought throughout the region. Concerns were expressed at the EiP not only about the scale, but also the intended status of this level.

22.97 We consider that a level above the regional target is justifiable in this sub-region for the following reasons.

- Housing affordability ratios are amongst the worst here in the whole region (primarily due to high house prices).
- Recent housing needs surveys have shown that affordable housing needs exceed the total amount of new development proposed (E7, para 2.6) including the high level of backlog.
- There is significantly higher levels of overcrowding and unfit homes than the regional average, particularly in Oxford city<sup>40</sup>.
- Targets above the regional average are already included in all the adopted Local Plans, with the exception of Cherwell. Oxford city also has an affordable housing SPG.

22.98 However we are concerned about a level as high as "at least 50%". Only Oxford city and West Oxfordshire DC in its rural settlements seek 50%, and few of the five districts have achieved much more than 20% affordable housing as a proportion of total new housing in any year over the 2001/02-2005/06 period<sup>41</sup>. It is also questionable whether "at least" 50% is compatible with the creation of mixed sustainable communities.

22.99 As to its status, we consider that it should be treated as a 'target' for consistency with other parts of the region<sup>42</sup>. It is intended to guide subsequent LDF preparation, as well as to provide a monitoring benchmark. But as made clear in Chapter 8 not all LDFs need be set at this level, and split districts would not necessarily be expected to include separate targets for areas inside and outside of sub-regions. We consider it perfectly legitimate for this target to be expressed in aspirational terms, since it may also contribute to setting the tone for development control negotiations, but there must be a sense of realism.

22.100 The problem in this sub-region is how to pitch a single target that will be realistic for the less highly priced areas but at the same time not weaken the negotiating position in Oxford city. The two options appear to be to express the target as "up to 50%" or "at

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<sup>40</sup> Oxford City Council statement Matter 8Eii.1, para 3

<sup>41</sup> RPS statement Matter 8Eii.2, Table 4

<sup>42</sup> This is a different interpretation from that accepted by the recent structure plan EiP Panel who accepted 50% as a monitoring level (transferred from policy into the text)

least 40% or 45%". On balance we consider that the target should be expressed as "at least 40%" because:

- viability work has not yet been undertaken to any great extent, and the results of the Housing Market Assessment had not been published by the end of the EiP;
- there appeared to be some confusion on the part of the principal authority as to whether the omission of low-cost market housing from the definition of affordable housing would change the target level<sup>43</sup>;
- the target is a proportion of all new housing, and hence a higher percentage would need to be achieved on some qualifying sites with small infrastructure contributions or lower land values, to offset lower provision on sites with older permissions and little or no provision on small sites;
- the "at least" terminology should avoid any weakening of the negotiating position within Oxford city (and in rural areas of West Oxfordshire).

22.101 There is an important reference to key worker housing in Policy CO4. Although it was generally accepted that guidance about type and size of affordable housing should be left to the LDF level, background work has been undertaken in Oxfordshire. This substantiates the shortage of housing opportunities for key workers through worker and employer surveys, and provides evidence of potential employees rejecting job offers because they were unable to find affordable housing in the area<sup>44</sup>. This points to the need for a range of affordable housing types, including in the intermediate sector. Although this is covered in the regional policy, because of its special significance to this sub-region, we consider that some elaboration would be appropriate in the background text.

22.102 Finally we are not convinced that affordable housing requires a separate policy. The information in the second sentence of the policy is already included in Policy H4 as amended to include reference to site size thresholds. The final statement about the in perpetuity benefits of affordable housing is implied in the affordable housing definition accompanying the regional policy, but could perhaps be made more explicit. We recommend that the opening sentence of Policy CO4 is relocated to Policy CO2, but with the adjustment to the level as above.

## **IMPLEMENTATION**

### **Implementation Plan Proposals**

22.103 We acknowledge that there has been a real attempt to identify only schemes of sub-regional significance in the SRIF table. Of the 11 transport themes identified, 5 are components of an Access to Oxford package and the remainder are schemes to facilitate new development at the country towns named in the strategy, together with Witney which has experienced considerable recent growth. GOSE largely endorsed the identification of these themes as basically sound and deliverable, and having emerged from a clear sub-regional transport strategy.

22.104 Subsequent additions may be necessary as more detailed work takes place on the growth locations, e.g. the Didcot - Wantage/Grove corridor where recent traffic modelling work indicates the importance of a Western Link Road at Didcot from the A4130 to A417. The southern part of this is reflected in the SRIF under the name of

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<sup>43</sup> The definition used in Oxfordshire CC's formal advice to SEERA in December 2005 clearly included low-cost market housing [SEP16, affordable housing paper, para 2]

<sup>44</sup> Key Worker Housing Needs Survey for the Oxfordshire Community Partnership, November 2004 quoted in SEP16, para 4

the Harwell Bypass. Rather than including the possibility of its southern extension to Chilton, consideration may need to be given to including its northern extension to the A4130. Other than this we were not convinced by arguments from other participants for the inclusion of additional schemes within these tables at this stage.

- 22.105 We comment further on the current state of East-West Rail in Chapter 23 on the MKAV sub-region.
- 22.106 We recognise that there has been an attempt to balance transport themes with water-related investment. Although we welcome this, we are not convinced that the development-related water supply and waste water treatment upgrades listed are of sub-regional importance. The possibility of an Upper Thames Reservoir, which would be a more significant scheme within the sub-region, is already included in the regional investment tables. We agree that the Banbury Flood Alleviation Scheme, although EA funding has apparently been delayed on this, should remain in the investment tables, although it should be transferred to our suggested Areas outside Sub-Regions schedule given that it is not located within the Central Oxfordshire sub-region.
- 22.107 We were not convinced that there were any missing elements in terms of cultural facilities or green infrastructure of sub-regional importance. Measures to manage recreational pressure at the Oxford Meadows SAC, as envisaged to be necessary by the Wildlife Trust, would be of local significance, and in any event such measures are now given more explicit recognition in the Assembly's additions to Policy NRM4 arising from the AA which we endorse (see Chapter 10).
- 22.108 Minor amendments to the SRIFs were identified by the principal authority, and this will no doubt be taken on board when the next version of the Implementation Plan is produced<sup>45</sup>.

## Transport (Policy CO6)

- 22.109 Turning now to how the identified themes are reflected in the draft Plan, the Access to Oxford package is identified as the sub-regional transport priority in Policy CO6. This is amongst the schemes included in the Regional Funding Allocation bid for 2009/10-2015/16. This advice was accepted by the Secretary of State for Transport as a basis for further appraisal of the measures within the package<sup>46</sup>. The development-linked objectives of the other Implementation Plan schemes are included in the supporting text to this policy. Hence the relationship between the draft Plan and Implementation Plan is very explicit, and to our mind provides a good practice role model of what might be sought in other sub-regional strategies in finalising the RSS.
- 22.110 Some participants argued for additional priorities to be expressed in Policy CO6. In our view this would dilute its clarity. But there is scope to make the supporting text (E7, paras 2.14-2.16) even clearer, as follows.
- In respect of the A34 the measures contained within the concepts of active traffic management, intelligent transport systems and access management could be made more explicit, given the need to reconcile its importance for longer distance traffic as well as development-related movement. Parallel initiatives to upgrade the freight capability along the South Hampshire-West Midlands rail network under Policy T11 could also be cross referenced.

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<sup>45</sup> Email from Oxfordshire CC to Panel Secretary, 28 March 2007 [CO35]

<sup>46</sup> Secretary of State for Transport's letter to the SE Regional Transport Board of 29 March 2007 [Tr3B]

- The existing reference to East-West Rail could be expanded to refer to ongoing collaboration with authorities in the MKAV sub-region to find a way of capturing development value along the route to facilitate its implementation.
- The objective of improving multimodal transport links in the corridor between Didcot and Wantage/Grove to improve access between homes and jobs could be brought out more clearly.

22.111 Policy CO6 implies that only Oxfordshire CC will be involved in the management and development of transport networks. Although it undoubtedly has an important role as both local highway authority and local transport authority, we recommend that the role of other key agencies is also recognised (HA and Network Rail).

### **Infrastructure (Policy CO7)**

22.112 Policy CO7 contains the stipulation that development will be contingent on the provision of timely infrastructure. For the reasons given elsewhere (Chapter 5) we consider that this should be deleted. Indeed the principal authority confirmed that it was not their intention to suggest an additional development control test over and above normal planning processes.

22.113 We consider that the remainder of Policy CO7 is unnecessary and could be deleted. The content of the first sentence is adequately covered in the background text E7, para 2.17, and the reference to the SRIFs could be included in E7, para 2.18.

22.114 We support the recognition given to social and environmental infrastructure (E7, para 2.18). The need to improve attractions and town centre facilities particularly in Didcot and Bicester is a useful complement to their importance in the spatial strategy. A cross-reference to the possible need for an Upper Thames Reservoir could be made to Policy NRM2.

### **Institutional Arrangements**

22.115 It was generally accepted that implementation of this sub-regional strategy was an easier prospect than in some others since there are well established joint working arrangements within this single County. This should ensure a coordinated approach to monitoring of the strategy. Nevertheless the existing Implementation section at the end of the strategy could usefully be expanded in respect of partnership arrangements and subsequent LDF working arrangements.

22.116 Partnership arrangements that might be highlighted are:

- the NGP partnership arrangements with Government for Didcot and Oxford
- a recently formed Management Board between Oxfordshire CC and the HA
- the Southern Quadrant Partnership linking Didcot and Wantage/Grove
- the West End regeneration partners in Oxford
- the business led group at Bicester.

22.117 If our recommendations are accepted for the two key development proposals in this sub-region, Didcot and Oxford, we suggest that the need for joint working at LDF level is stressed. In Didcot working relationships are already well established between SODC and VWHDC, as discussed above (see para 22.77), and coordinated LDF Core Strategies have been prepared in parallel covering the first growth phases.

22.118 Our recommendation for an SDA in south Oxford will require new working arrangements to be forged between Oxford City Council and SODC. We appreciate that SODC have so far fiercely opposed any outward expansion of Oxford into their

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area, but we hope that previous differences of opinion can be put aside and that joint work can progress on a selective Green Belt review as part of an AAP. As already mentioned, we recommend that GOSE offers procedural assistance and monitors progress closely.

22.119 The table showing delivery mechanisms and lead/support agencies would be better located in the Implementation Plan.

## RECOMMENDATIONS

### **Recommendation 22.1**

Revise Policy CO1 to reflect an aspiration to maintain its world-class status, to incorporate growth immediately adjacent to as well as within Oxford, and to make explicit an aim to improve the self-containment of the surrounding (so-called “country”) towns (para 22.12, 22.13)

### **Recommendation 22.2**

Expand the text to Policy CO1 to acknowledge the cross boundary interrelationships including the Oxford to Cambridge Arc initiative and the regional priority given to the reinstatement of an East-West Rail link, and include the aim of fostering a development axis between Didcot and Wantage/Grove based on its economic strengths and to improve public transport between homes and jobs in the southern part of the sub-region. (para 22.6, 22.13)

### **Recommendation 22.3**

Amend the housing provision levels in Policy CO2 by:

- increasing the total sub-region from 34,000 to 40,100 2006-26. (para 22.50)
- increasing South Oxfordshire (part) by 750 dwellings to take account of the NGP. (para 22.84)
- decreasing the Vale of White Horse (part) by 250 dwellings (+ 750 for the Didcot NGP but – 1,000 in the remaining part of the district within the sub-region outside Didcot and Wantage/Grove. (paras 22.49, 22.84)
- increasing Oxford by 1,000 dwellings to take account of the NGP. (para 22.75)
- including a south Oxford SDA of some 4,000 dwellings to be divided between Oxford and South Oxfordshire as a result of more detailed work. (para 22.75)
- increasing West Oxfordshire by 600 dwellings to reflect the potential of Witney. (para 22.93)

### **Recommendation 22.4**

Give in the accompanying text to Policy CO2 a summary of the phasing implications of Didcot's growth between the two adjoining local authority areas, together with the intention to operate a pooled system of development contributions to fund the Harwell bypass and its northern extension. (para 22.84)

### **Recommendation 22.5**

Add to Policy CO3 that a selective review of Green Belt on the southern edge of Oxford will be undertaken through a coordinated LDD. (paras 22.65, 22.72)

**Recommendation 22.6**

Amend the affordable housing target to "at least 40%" from at least 50%, and relocate the opening sentence of Policy CO4 to Policy CO2 and delete the rest of Policy CO4 (paras 22.100, 22.102)

**Recommendation 22.7**

Redraft Policy CO5 on employment land provision to indicate the positive objectives being sought at the named locations (para 22.24), and to acknowledge that some new employment land in addition to the safeguarded land may be needed, but that the objective should be to avoid worsening the jobs-housing imbalance. (para 22.25)

**Recommendation 22.8**

Include a job growth estimate of 18,000 for monitoring against for the 2006-16 period, and the elements of smart growth most relevant to this sub-region in the text to Policy CO5. (paras 22.15, 22.31)

**Recommendation 22.9**

Amend Policy CO6 on transport to indicate that Oxfordshire CC will work with the HA and Network Rail to achieve these objectives (para 22.105)

**Recommendation 22.10**

Clarify the supporting text to Policy CO6 in respect of management measures on the A34, by expanding the existing reference to East-West Rail, by giving more emphasis to the objective of improving multimodal transport links in the corridor between Didcot and Wantage/Grove to improve access between homes and jobs. (para 22.110)

**Recommendation 22.11**

Delete Policy CO7 on infrastructure. (paras 22.112, 22.113)

**Recommendation 22.12**

In the Infrastructure text, make a cross-reference to Policy NRM2 on the possible need for an Upper Thames Reservoir (para 22.114)

**Recommendation 22.13**

Expand the final Implementation section to indicate partnership arrangements and to stress the need for joint working at LDF level between SODC and VWHDC on Didcot, and between SODC and Oxford City Council on the south Oxford SDA. (paras 22.115, 22.117)