

# **Report to Oxford City Council**

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an Inspector appointed by the Secretary of State for Communities and Local Government Date: 14th November 2012

### PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED) SECTION 20

### REPORT ON THE EXAMINATION INTO BARTON AREA ACTION PLAN LOCAL PLAN

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# Abbreviations Used in this Report

AAP [CD] CIL CS The Framework LDS LP MM Plan RS SA SCI SCS SODC	Barton Area Action Plan Local Plan Core Document Community Infrastructure Levy Core Strategy National Planning Policy Framework Local Development Scheme Local Plan Main Modification Barton Area Action Plan Local Plan Regional Strategy Sustainability Appraisal Statement of Community Involvement Sustainable Community Strategy South Oxfordshire District Council
The Plan	Barton Area Action Plan Local Plan

### Non-Technical Summary

This report concludes that the Barton Area Action Plan Local Plan (AAP) provides an appropriate basis for the planning of the area until 2026 providing a number of modifications are made to the AAP. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the AAP. All of the modifications to address this were proposed by the Council, and I have recommended their inclusion after full consideration of the representations from other parties on these issues.

The modifications can be summarised as follows:

- Inclusion of policy MP1 that presumes in favour of sustainable development;
- Inclusion of supporting text to clarify the approach towards development proposals in the Old Headington Conservation Area that fall within the AAP boundary;
- Revised wording for policies BA1 and BA7, and their supporting texts;
- Inclusion of Annex 3 Housing Trajectory; and
- Revisions to Maps 1 and 6.

### Introduction

- 1. This report contains my assessment of the Barton Area Action Local Plan (AAP) (the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether its preparation has complied with the Duty to Co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the AAP is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (the Framework) (paragraph 182) makes clear that to be sound, a Local Plan (LP) should be positively prepared; justified; effective and consistent with national policy.
- 2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft Plan (April 2012), which is the same as the document published for consultation in February 2012, together with the schedule of proposed minor post publication changes contained in core document ([CD]) 1.4. However, the AAP consultation period finished immediately prior to the publication of the Framework. Thus, a further round of consultation took place inviting comments on its implications for the soundness of the AAP. I have taken all responses into account.
- 3. My report deals with the main modifications that are needed to make the AAP sound. These are identified in bold in the report **(MM)**. In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the AAP unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix to this report.
- 4. The main modifications that go to soundness have been subject to public consultation and, where necessary, Sustainability Appraisal (SA). I have taken the consultation responses into account in writing this report.

### Assessment of Duty to Co-operate

- 5. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council has complied with any duty imposed on them by section 33A of the 2004 Act in relation to the AAP's preparation.
- 6. It is clear from the Council's Self Assessment Paper [CD1.16], which lists relevant joint partnership arrangements on a range of issues including; regeneration, strategic housing, health, education, employment, transport and policing matters, meetings and correspondence, that it has sought to engage with all of the bodies prescribed in s110 of the Localism Act 2011 at appropriate stages in the plan making process, as well as many other partner organisations.
- 7. The proposed development at Barton falls entirely within the administrative boundary of Oxford City Council, but it shares its northern boundary with South Oxfordshire District Council (SODC). As well as contributing towards meeting Oxford's housing need, the development of the Barton strategic site will also help relieve the pressure of housing need in Oxfordshire as a whole and is consistent with the SODC's preference stated during the Oxford Core Strategy (CS) production for housing provision to be maximised within Oxford.

- 8. The Duty to Co-operate is also relevant because the proposed development at Barton involves a planning matter that falls within the remit of the Oxfordshire County Council regarding its impact upon the A40, which is a key part of the strategic primary route network that links Wales and the West through Oxfordshire to the M40. Regular project meetings have been held between officers of both Councils. The statement of common ground [CD7.15.2] confirms that the County Council has no objections regarding the principle of the AAP development and are keen to bring the proposed development forward as part of a wider partnership. The few transport matters that were not agreed at the submission stage of the AAP have been resolved during the examination process, as confirmed in the final statement of common ground [CD 7.26], and are the subjects of proposed main and additional modifications.
- 9. I conclude that the Duty to Co-operate has been met.

### **Assessment of Soundness**

### Preamble

- 10. The city-wide planning policies that establish the overall framework for the AAP are set out in the Oxford Local Plan 2001-2016 [CD5.5] and in the CS, adopted in 2011 [CD5.1]. CS policy CS7 allocates 'Land at Barton' as a strategic location for mainly residential development comprising 800 1,200 homes with supporting infrastructure including a primary school, public open space and access improvements. The policies and proposals of the AAP build on policy CS7 and aim to deliver its key outputs. Background paper [CD1.18] demonstrates how the AAP clearly links with the CS and other plans and documents.
- 11. The AAP does not supersede any of these development plan policies, but its consequential changes to the adopted Policies Map, as depicted in [CD1.15], are listed in Annex 2 of the AAP. These refer to the addition of the AAP boundary and the removal of the SR5 designation for Barton Village Nature Park.
- 12. The Localism Act provides the mechanism for the revocation of regional strategies, but at the time of writing this report the South East Plan (RS) remains part of the development plan. Nevertheless, the implications of the intended revocation of the RS on housing provision in Oxford were discussed at a full Council meeting held in September 2010 and were explored during the examination of the CS. It was concluded that the overall housing target for Oxford set in the RS is appropriate, and no evidence has been presented to the examination of the AAP that leads me to a different conclusion. The scale of development proposed at Barton appropriately reflects the need to meet this target.
- 13. Although the AAP was prepared prior to the new soundness requirement of the Framework, it is clear it has been positively prepared. Also, that it reflects the 'golden thread' of sustainable development and includes policies that guide how the presumption should be applied locally [CD1.20]. However, to make this explicit for soundness, **(MM1)** is necessary. This change inserts supporting text and new policy MP1, which closely reflects the model policy within the specific context of Oxford.

- 14. Also for consistency with the Framework, (MM7) adds the words, 'the setting', to the reference to the Old Headington Conservation Area at the third bullet point of policy BA13: Design. In addition, (MM8) provides the housing trajectory as new Annex 3.
- 15. Cross-boundary issues falling within the SODC area relate to the consequential impacts of the proposed development, which include recreational pressure on the Sidlings Copse and College Pond SSSI, and the visual impact on the Green Belt. These matters are satisfactorily addressed by policies BA13: Design and BA19: Sidlings Copse and College Pond SSSI, and by **(MM2)**, which amongst other changes, amends Maps 1 and 6 to remove the unintended suggestion that the development proposed in the AAP could give rise to a significant increase in the number of people using the SSSI area and the Green Belt countryside to the north, for recreation.

### Main Issues

16. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified four main issues upon which the soundness of the AAP depends.

#### Issue 1 – An Overview of the Soundness of the AAP

# Whether the scope, boundary and content of the AAP are sound and will enable its Spatial Vision and Objectives to be achieved.

- 17. The evolution of the AAP is clearly based upon the testing of feasible options in order to find the most appropriate policy solutions. The Preferred Options document [CD1.5] sets out the range of options that have been tested and the SA [CD1.10] makes explicit why some were rejected and others were carried forward to the proposed submission stage. The SA process is generally satisfactory, except for its appraisal of a residential proposal for land at Ruskin Fields within the Old Headington Conservation Area. This proposal was first put forward in response to the Council's call for sites for the separate Sites and Housing Plan and possible links to the AAP. It was carried forward to the Preferred Options stage of the AAP and was SA tested. As a consequence of the conclusions of that SA it was not carried forward to the submission plan.
- 18. However, it is not clear from the SA process that all of the most up-to-date evidence submitted by the promoters of the Ruskin Fields site was taken into account. Consequently, it is unclear if the Council's decision not to carry the proposal forward in the AAP is based upon robust evidence and transparent reasons. To rectify this weakness in the SA process, the SA of the Ruskin Fields site was re-run and subjected to public consultation during the examination period [CD7.23]. Several suggested schemes have been submitted for residential development, including 50% affordable housing, and provision for public open space at Ruskin Fields, all of which fall within the two options that were re-assessed in the addendum SA. The larger option assessed is for between 175-193 dwellings and smaller is for around 70 homes.
- 19. Consideration of these options at the hearings sessions was deferred until after the completion of the further SA work and consideration of the public consultation comments upon it at a meeting of the full Council on 20 September 2012.

- 20. The scoring of the two options against some of the SA objectives has been challenged. I agree that the significantly negative score given for both options in respect of SA objective 13: to conserve and enhance Oxford's biodiversity, is not supported by the evidence, which indicates that both options, particularly the smaller, would have a less damaging impact than that indicated in the SA. However, I consider that all of the other SA objectives have been scored appropriately and, for the reasons that I give below, the decision to reject the option of development at Ruskin Fields remains sound.
- 21. I conclude that the SA has been made demonstrably robust by the additional testing of the two main options for proposed development at Ruskin Fields, that all feasible options have been properly tested and that the reasons why some options have been rejected have been clearly stated.
- 22. Although it is not the perception of all representors, public consultation throughout the preparation of the AAP has been carried out in accordance with the Statement of Community Involvement (SCI) [5.14 a & b]. The Council has clearly put significant and innovative effort into engaging the local and wider communities, and hard to reach groups. It is clear that their views, together with the SA and democratic role of the elected Council Members have influenced the evolution of the AAP's policies and proposals.
- 23. The scope of the AAP accords with the CS and the Local Development Scheme (LDS) [CD5.12a and b]. Its spatial vision is consistent with and complements that of the CS, and the Sustainable Community Strategy (SCS) [CD 6.3]. Its Objectives align with the strategic objectives of the CS, which have been found sound. They are supported by robust evidence and were tested at the Issues Stage [CD7.16], with 63% of representations supporting them. The five interlinked AAP Objectives clearly set out the priorities of the Plan and what it is seeking to achieve.
- 24. Alternatives for the AAP boundary were considered at the Issues Stage. The selected boundary is supported by that public consultation process and it clearly links with the Plan's Objectives, which include delivery of a strong and balanced community and bringing wider regeneration of the neighbouring estates. To the north of the A40 the AAP boundary includes the strategic development site, where most of the new development will be located, and the existing community of Barton where regeneration benefits could result. To the south of the A40 it encompasses the community at Northway, which may also benefit from regeneration and part of the Old Headington Conservation Area, which is particularly sensitive to change [CD2.1].
- 25. Map 1 intends to show how the AAP policies will deliver its Spatial Vision and Objectives for the strategic development site and its surroundings. However, it does not show the AAP boundary and, thus, it does not provide an effective Key Diagram. (MM2) rectifies this.
- 26. With regards to the content of the AAP, policies BA1- BA19 generally provide sufficient clarity to guide development within the strategic development site in line with the Plan's Objectives. The final policy, BA20: Linking local people to economic opportunities, together with several other policies of the AAP aim to promote regeneration in Barton and Northway, parts of which are

acknowledged as being deprived, and to ensure that the strategic development site is not inward looking.

- 27. However, whilst paragraph 4.1 of the AAP refers specifically to the sensitivity to change of the Old Headington Conservation Area and its need for special consideration, the Plan is silent in terms of policy, supporting text or reference on Map 1 (Key Diagram) on the future intentions for this area, including land at Ruskin Fields, which was considered but rejected as a potential development site at the Preferred Options stage. This is a gap in the policy content of the AAP which gives rise to uncertainty. Thus the AAP is ineffective and unsound in this regard.
- 28. Some representations suggest that Ruskin Fields should be the subjects of a local protective designation. This was assessed under the 'do nothing' option of the SA. However, whilst the Old Headington Conservation Area Appraisal [CD2.1] highlights the significant contribution that Ruskin Fields and their hedgerow boundaries make to the character and greenness of the Conservation Area, detailed evidence has not been presented to the examination that demonstrate that these characteristics could not be adequately preserved through national policy and legislation, together with the local city-wide development plan policies that refer to Conservation Areas. I conclude that a special protective designation is not justified.
- 29. Turning to the residential options considered for Ruskin Fields, neither option is required to ensure that the AAP would deliver the number of homes required by the CS in policy CS7, although the CS range of between 800-1200 dwellings is not a ceiling that would on its own preclude development at Ruskin Fields. However, the promoters of the site conceded at the hearing session that the larger scheme would have a significantly adverse affect on the character of the Conservation Area. Furthermore, that scheme has not received clear support from the County Council as Highways Authority for its access provision. Its allocation in the AAP is not, therefore, justified and its delivery having regard to its access provision is uncertain. For these reasons, its inclusion would make the Plan unsound.
- 30. Benefits of the smaller option would include provision of around 35 much needed affordable homes. It would also open up private greenfield land and would provide a significant additional amount of public open space in an area where provision falls short of the CS policy CS21 target to maintain a city-wide average of 5.75 hectares of publicly accessible green space per 1,000 population. It could also provide improved east/west pedestrian and cycle linkages across the site and it could enable provision of pedestrian and cycle linkages across the A40 without the need to upgrade Stoke Place.
- 31. However, to be balanced against these benefits of the smaller option, whilst the Highways Authority would support a vehicular access from Foxwell Drive, such provision would result in loss of an area of green space owned by the Council for which residents in Northway are seeking Town Green status. Thus access provision is uncertain for the smaller option also.
- 32. Furthermore, taking into account all of the written and oral evidence, and my views of the site from several short and long distance vantage points, I entirely agree with the conclusions of the Old Headington Conservation Area Appraisal

[CD2.1], the SA and the Council's assessment [CD7.13.1 & CD7.13.1.1], that the Ruskin Fields create an important open setting to the tightly knit historic core of the Conservation Area that is fundamental to its intrinsic character. Whilst development could feasibly be designed and laid out to preserve the appearance of the Conservation Area and to safeguard the ecological importance of the hedgerows and trees that form the Fields' boundaries, development, no matter how sensitively designed, would inevitably result in the reduction of and would be intrusive in views of this green wedge and would have an adverse impact on the distinctive character of the Conservation Area. I conclude that such harm to the Conservation Area would not be outweighed by the individual or cumulative benefits of affordable housing and open space provision and improvements to pedestrian and cycle links. Consequently, I further conclude that allocation of land at Ruskin Fields would be inappropriate and unjustified, and would therefore be unsound.

- 33. In order to explain the policy approach with regards to the Old Headington Conservation Area within the AAP boundary, proposed change **(MM3)** would insert additional supporting text after paragraph 4.1. This clarifies that any development proposals that come forward within the Conservation Area would have to demonstrate that the statutory requirement to preserve or enhance its character or appearance would be met. This main modification ensures that the AAP provides sufficient certainty regarding consideration of development proposals in the Conservation Area. It thereby makes the AAP effective and sound in this regard.
- 34. I conclude that with the changes referred to above, the scope, boundary and general content of the AAP are sound, and will enable its Spatial Vision and Objectives to be achieved.

# Issue 2 – Integrating Barton with the Surrounding Area and the Rest of Oxford

# Whether the approach for integrating development at the Barton strategic site with the surrounding area and with the rest of Oxford is sound, and if so, whether policies BA1-BA7 that seek to achieve this are also sound.

- 35. In line with the development plan and national policy, the AAP seeks to ensure social inclusion and the integration of the future new community at Barton with neighbouring communities and the rest of Oxford. A fundamental aim of the submitted AAP to achieve this is the transformation of the A40 ring-road from a strategic highway to an urban street with new, at-grade pedestrian and cyclists' highway crossings.
- 36. The A40 runs immediately to the south of the strategic development site and dissects the AAP area from east to west. This part of the highway comprises a 4-lane dual carriageway with a substantial central reservation of mature trees and it has a maximum speed limit of 70mph. It carries a high volume of traffic, around 40,000 vehicles daily, of which approximately 5% are heavy goods vehicles. Consequently, it acts as a physical barrier between the communities to its north and south, and it creates adverse living conditions in terms of noise and air quality.
- 37. Policy BA1: Transforming the ring-road, seeks to achieve the aspired transformation by securing a reduction of the speed limit to 40mph, maximising

the scope to provide new homes facing the northern side of the A40 and relandscaping the central reservation by reducing the density of the existing planting. The supporting text to policy BA7: Pedestrian and cycle links, refers to the provision of multiple safe and convenient pedestrian and cyclist crossing points, which may be surface level. It is clear from the traffic modelling that has been undertaken to support the policies, the evolving Master Plan for the strategic site and in the written and oral evidence presented to the examination by the Council that its preference is for surface level crossings rather than subway or bridge crossings. However, this combination of measures is not clearly and convincingly supported by the SA, the public consultation process or by example of what has been achieved by a speed reduction to 40mph elsewhere on the A40 around Sunderland Avenue, where the characteristics of the highway are different and are not, therefore in any case, directly comparable.

- 38. Whilst it is generally agreed that it is important that the development of the strategic site does not result in a new community that is isolated, it is questionable if the intended transformation of the ring-road is paramount and justified in order to achieve integration. Furthermore, several representations, the CS at paragraph 6.1.3, the Oxford Landscape and Visual Appraisal [CD1.19] and the Council's evidence at the hearing [CD7.13.2] highlight that the conglomeration of separate village identities within Oxford are part and parcel of its intrinsic character. Therefore, the aspired transformation of the A40 is not necessary or justified to achieve social inclusion within the Oxford context. Good connectivity and sustainable access to jobs and facilities are fundamental to achieving this, but not necessarily by the means proposed in the AAP that are dependent upon the speed limit being reduced to a maximum of 40mph.
- 39. The Noise Assessment [CD7.17] indicates that reduction of the speed limit to 50mph would result in a minor reduction in noise pollution (2.4dB) within the AAP area. A moderate reduction (4.8dB) could be achieved if the speed limit was reduced to 40mph, which would be beneficial to the living conditions of residents and the development capacity of the strategic site.
- 40. To be balanced against this environmental benefit, the Transport Modelling Studies [CD7.18] indicate that a speed reduction to 50mph would have an adverse impact on journey lengths that would be exacerbated by a reduction to 40mph. However, although these increased journey times would have detrimental economic impacts, the evidence does not clearly indicate that alone they would outweigh the environmental and development benefits that would be achieved by a speed reduction.
- 41. The County Council has identified a package of transport measures to support the delivery of the strategic site, which includes concessionary support for the reduction of the speed limit to 50mph, to enable the provision of an at-grade access junction. However, it objects to the proposed reduction to 40mph, which would be necessary if further surface level pedestrian/cyclist crossing points were provided, because it considers that a 40mph speed limit would compromise the strategic function of the ring-road and would be contrary to its aim of ensuring that avoidable risks for road users are not created.
- 42. Both the County Council and Thames Valley Police are concerned that the proposed provision of surface level pedestrian/cyclist crossings in addition to the access junction at-grade crossing could result in avoidable accidents,

especially if the 40mph speed limit is exceeded or when traffic levels are light and 'amber gamblers' may take their chance in crossing the highway at inappropriate times or places. I share these concerns for safety, particularly because the Police have stated that due to reducing resources they will be unable to regularly undertake speed limit enforcement [CD7.14.2.105.1]. The Council has not produced robust evidence in the form of detailed proposals or other evidence showing how, in reality, the reduction of speed on the approach to the development would be achieved and how this speed would be maintained throughout the full stretch of the road in both directions to demonstrate that these concerns for the safety of the road users are unfounded or exaggerated. Therefore, neither the policy proposals themselves nor their inconsistency with the CS are justified by the evidence, nor are they demonstrably the most appropriate.

- 43. I am not convinced either that the visual cues proposed will be sufficient to modify driver behaviour to that appropriate on a city street. Driving eastwards towards the area drivers would be expected to reduce from 70mph to 40mph over a short distance with no significant changes in road conditions. Driving westwards, the anticipated cue of frontage development will not be present. Whilst not being a justification for allocating land at Ruskin Fields, the absence of development on the southern side of the A40 would severely undermine the creation of the aspired city street character for this section of the highway.
- 44. I consider also that the visual benefits of re-landscaping the central reservation have been over-estimated. Whilst it would increase inter-visibility between the communities north and south of the A40, this does not necessarily result in transformation of the ring-road or greater integration. The reduction in the density of the mature trees would reduce their softening effect and could increase the harsh visual and adverse noise and air quality impacts of 4 heavily trafficked lanes of highway for communities to the north and south. It would also detrimentally affect views into and out of the Old Headington Conservation Area.
- 45. Furthermore, it is questionable if the policy has a realistic prospect of being implemented. Whilst the case of Rv.Warwickshire County Council (1998) 75 P&CR 89 (known as the Powergen case) establishes that it is incumbent on all parties to exercise their residual statutory powers to secure the implementation of the AAP in its adopted form, it does not override or pre-empt the separate, mandatory public consultation process that is associated with the necessary making of a speed limit order pursuant to s84 of the Road Traffic Regulation Act 1984.
- 46. Given the significant level of objection to the reduction of the speed limit to 40mph [CD1.13], including from the County Council, as the Highways Authority for the A40, it cannot be assumed that even if the proposal were justified there is a reasonable prospect that it would be deliverable. The proposal is not, therefore, clearly effective.
- 47. Taking all of these matters into account, I conclude that a reduction of the speed limit would result in some environmental benefits for both the existing and new communities in the AAP area. However, the transformational aspirations of policy BA1 are not justified by robust evidence, it does not demonstrably reflect the most appropriate strategy and therefore it is not

justified. Implementation is dependent upon a separate public consultation process, the outcome of which cannot be assumed to be favourable. Therefore, it is not effective. The supporting text to Policy BA7 also refers to possible surface level crossings of the A40. It is, therefore, unsound for similar reasons.

- 48. All of these views and my conclusions that these policies are unsound were discussed at the hearings sessions. The Council has subsequently acknowledged that the submitted Policies BA1 and BA7, together with their supporting texts may overstate the AAP's transformation aspirations for the A40 and that they may be inflexible if the requisite speed limit reduction to 40mph cannot be achieved. In response, it has proposed alternative policies and supporting text that are detailed in (MM4) and (MM6) and amendments to Maps 1 and 6, as depicted in (MM2). These were subject to public consultation and SA [CD7.23], and their merits were discussed and taken into account at a further hearing session.
- 49. In addition to being less prescriptive, by removing a precise speed reduction aspiration **(MM4)** adds supporting text that refers to proposed physical measures to the A40 to slow traffic, such as changes to the lane widths, the use of alternative surface materials, street lighting and signage. Consistent with the CS, it requires provision of a buffer to the A40 and it removes the preference for development to face the northern side of the A40. Instead, it emphasises the need for innovative design to aid community integration and to achieve good quality living conditions. It also removes the publicly unpopular intention to reduce the density of the central reservation, but retains reference to consideration of views into and out of the Old Headington Conservation Area.
- 50. **(MM6)** removes from policy BA7 and its supporting text all references to atgrade pedestrian/cyclist crossings of the A40. The proposed up-grading of Stoke Place is retained in the policy. Whilst this proposal is controversial, it would restore an historical link in a way that could be sensitive to Stoke Place's role and character in the Old Headington Conservation Area. It has been suggested that a pedestrian/cyclist link from Foxwell Drive would be more appropriate. This route has merit and could provide an additional link if necessary.
- 51. With these changes policies BA1 and BA7 are made sound and consistent with the CS, and will enable the A40 ring-road to be altered in a way that will promote the integration of the new community with the neighbouring communities within the AAP area.
- 52. Policy BA5: Sustainable Travel seeks to ensure that development will be planned to encourage travel to be as sustainable as possible, by minimising the need to travel by car by providing well connected walking, cycling and public transport routes and by encouraging minimum car parking provision. Bus service provision in Oxford is of an excellent standard and it is against this background that plans for connections to the new development are set. Meetings with the major bus companies have been positive with regards to providing new and/or revised bus routes to serve the AAP area.
- 53. Some concerns have been raised that increased public transport provision could be detrimental to the living conditions of residents of the existing communities within the AAP area, but since generally provision will be by means of extended

routes through the strategic site rather than by additional numbers of buses, the impact is likely to be negligible. In Northway there would be a short section of new route to link from the new access junction to existing bus routes in the area, however the potential routes for this new section are lightly trafficked. Thus the anticipated impact would be small and would in any case be outweighed by the benefits of reduced car reliance.

- 54. Policy BA6: Vehicle Access informs that the primary vehicle access will be from a new signal-controlled at-grade junction or roundabout on the A40 at the western end of the strategic site. It will incorporate bus and emergency vehicle movements between the strategic site and Northway, together with pedestrian and cyclist access. But in order to avoid 'rat-running' through Northway the new junction will not allow access for private cars into Northway. The policy also makes provision for a second access into the strategic site via Fettiplace Road in Barton, which will allow private car movements. The scale of additional traffic that is likely to use this access and to move through the existing Barton estate has been robustly assessed. It would increase traffic levels considerably during the morning and evening peaks, but the levels would nevertheless remain low and well within the capacity of this part of the road network.
- 55. These two policies are sound and will contribute towards the integration of the proposed new community at Barton with the surrounding area and the rest of Oxford.
- 56. The recreation ground, sports pitches, allotments (cultivated and uncultivated) and Barton Village Nature Park are situated towards the eastern boundary of the site. In their current location and orientation they could act as a further physical barrier to integrating the new and existing communities at Barton. To reduce this potential constraint, policy BA2: Recreation Ground permits the re-orientation of the recreation ground and sports pitches. Policy BA3: Allotments, permits development on the uncultivated part of the allotments. Both policies seek to ensure that there will be no net quantitative or qualitative loss of these facilities within the AAP area. However, to ensure continuity of sports pitch provision, **(MM5)** is necessary. It requires any re-configuration works to the sports pitches to take place in the off-season.
- 57. To compensate for the loss of Barton Village Nature Park, which is shown from a series of biodiversity studies to have low biodiversity value [CD2.4] and [CD2.7], policy BA4: Public open space, proposes a high quality linear park alongside Bayswater Brook on the northern boundary of the strategic site, which, in contrast has significant biodiversity and recreational potential [CD2.4] and [CD2.7]. The provision of the linear park would comprise part of the minimum 10% of the strategic development site area, which policy BA4 requires to be provided as public open space.
- 58. Representations have questioned if this overall provision of public open space is sufficient to comply with CS policy CS21. There are differing methodologies that can be used for forecasting population from new dwellings, but it is reasonable to predict that if the bare minimum 10% open space was provided the city-wide standard would be reduced by around 1.5%. However, the emerging Master Planning of the strategic site indicates a significantly higher provision of open space, of around 15%. Furthermore, policies BA2, BA3 and BA4 will

cumulatively ensure that all necessary categories of open space are provided, and at a high standard.

59. I conclude that the strategy and policies of the AAP for open space provision are sound and will contribute towards the integration of the proposed new community at Barton with the surrounding area and the rest of Oxford.

# Issue 3 – Creating an Inclusive, Mixed Community and Providing Development that is Sustainable and of a High Quality Design

# Whether policies BA8-BA13 and BA15-BA19, which aim to create a vibrant, vital, inclusive and mixed community, and to provide development that is sustainable and of a high quality design are sound.

- 60. The first Objective of the AAP is to 'deliver a strong and balanced community'. Policy BA8: Housing mix, seeks to assist this by setting out the preferred housing mix across the strategic site by proportions of dwelling sizes that are applicable to both market and affordable housing. The preferred mix reflects the Balance of Dwellings SPD, adopted in 2008 [CD5.9], which aims to increase the proportion of family dwellings throughout Oxford. Although the relatively high proportion of family homes required by BA8 (15%-20%) has been criticised by some who consider that there is a particular need for smaller, keyworker dwellings in this locality, the bias towards larger homes is particularly justified in this area where a new community is being built, to enable growing families to remain in the area.
- 61. CS policy CS24 generally requires a minimum provision of 50% affordable housing, but it includes flexibility to take account of viability considerations. Policy BA9: Affordable housing, has been criticised in representations for reducing the minimum requirement to 40% in respect of the strategic development site. However, this reduction is justified by a robust viability study [CD2.6] that takes account of the high infrastructure costs associated with the delivery of the strategic site. Several alternative proportions and tenure splits were tested. 50% was found to be unviable, but the AAP policy requirement, which includes provision for 100% social rent, best achieves the Council's key objectives whilst ensuring the strategic site will be deliverable. The policy also incorporates flexibility to achieve between 35%-60% affordable housing in any phase, provided that the overall target of 40% is achieved. In addition to assisting viability this will avoid concentration of affordable housing in single phases or locations within the strategic development site.
- 62. Policies BA10 and BA11 make provision for a Local Centre including a 2,000 square metres convenience retail use and a multi-purpose community hub that will contain a primary school. Both policies emphasise the requirement for the community facilities to be well served by footpaths, cycle routes and to be accessible by public transport. The provision of these facilities within the strategic development site is consistent with the requirements of the CS and will promote the creation of a sustainable new community, rather than simply a vast new housing estate. These policies are underpinned by robust evidence, including a retail assessment [CD2.10], but they have been criticised for not prescribing a precise location. However, to do so would unnecessarily constrain the evolving Master Planning process. Their supporting text has also been

criticised for omitting reference to some uses, for example a police facility, but the uses listed are not intended to be prescriptive or exhaustive.

- 63. Policy BA12: Energy efficiency, requires development to optimise energy efficiency and to demonstrate that at least 20% of their energy needs will be delivered through on-site renewable or low-carbon energy sources. Some representations seek a higher percentage, but whilst the 20% is justified by the Council's adopted Natural Resource Impact Analysis SPD [CD5.8] and its experience of applying this target, a higher target has not been justified by robust evidence.
- 64. In addition to requiring that development is energy efficient, the AAP also requires that it is of a high standard of design in terms of both its appearance and functionality. Policy BA13: Design, clearly sets out principles to guide the preparation of a site-wide design guide.
- 65. The AAP is supported by robust flood risk assessments [CD2.9] and [CD6.6], and a sewer impact study [CD2.11]. These indicate that apart from land around Bayswater Brook, which will be used as open space, the strategic development site lies within flood zone 1. Policies BA15, BA16 and BA17 provide sound policy guidance on flooding, surface water drainage, water supply and wastewater drainage. Although some representations highlight that there are localised issues in Northway concerning flooding/wastewater drainage, these will not be exacerbated by proposals of the AAP. All matters of concern to the Environment Agency and Thames Water Utilities Ltd regarding the AAP have been resolved by the Council, as detailed in the statements of common ground [CD7.15.5] and [CD7.15.3]. These policies are sound. Policy BA18: Land Remediation is also sound.
- 66. Policy BA19 requires the approval and implementation of an impact avoidance plan for avoiding harm to Sidlings Copse and College Ponds Site of Special Scientific Interest (SSSI), which lies within SODC area, that could result from increased recreational pressures from the development. SODC have requested that the policy or supporting text should add reference to the need for developers to agree with SODC a plan for avoiding harm to the SSSI. However, the site where development will occur and where any mitigation is required to avoid harm to the SSSI is in Oxford. The Council is, therefore, the s28G authority for the 1981 Wildlife and Countryside Act, in this case. The Council has agreed that it will include SODC in any consultation on any such matter, but it is not necessary for soundness to formalise this in the AAP.
- 67. I conclude that policies BA8 BA13 and BA15 BA19 clearly promote the creation of a vibrant, vital, inclusive and mixed community and development that is sustainable and of a high quality design; and with **(MM7)** they are sound.

### Issue 4 – Implementation and Delivery

Whether there is a reasonable prospect that the infrastructure requirements and the development requirements of the AAP can be funded and delivered during its timeframe, and if there are satisfactory mechanisms for monitoring their delivery. Whether policy BA14, which aims to ensure this, is sound.

- 68. A detailed viability study for development of the strategic site [CD2.6] indicates that there are substantial associated infrastructure costs amounting to around £30 million. However, at its early stages of production the AAP was supported by the Homes and Community Agency and latterly, the Council as landowner of the strategic site has formed a joint venture company, Barton Oxford LLP (LLP), with an investment partner, Grosvenor Developments, which will fund the infrastructure needed to get the development underway (£15 million approximately).
- 69. Policy BA14: Delivery, soundly details the approach that will be taken for planning obligations and charges payable through the Community Infrastructure Levy (CIL) to mitigate the impacts of the new development and to provide associated social and community infrastructure, estimated to amount to around £15 million, in line with a phasing strategy to be submitted and approved by the Council.
- 70. There is no reason to doubt the commitment of the investment partner or its ability to adequately invest in the scheme, and Master Planning is well advanced. In addition to the LLP, the AAP is being driven by a close partnership with the County Council by way of a formal project team arrangement. It is clear also that the AAP has the general support of other essential stakeholders and service providers [CD1.16]. Annex 3 of the AAP sets out a clear monitoring framework.
- 71. I conclude that there is a good prospect that the infrastructure requirements and the development requirements of the AAP can be funded and delivered at the appropriate time during its timeframe and that there are satisfactory mechanisms for monitoring their delivery; also that policy BA14, which aims to ensure this, is sound.

## **Assessment of Legal Compliance**

72. My examination of the compliance	e of the AAP with the legal requirements is
summarised in the table below.	conclude that it meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The AAP is identified within the approved LDS (April 2012) which sets out an expected adoption date of December 2012. The AAP's content and timing are compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in October 2006 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed main modification changes.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations HRA has been carried out and is adequate.
National Policy	The AAP complies with national policy except where indicated in this report and main modification changes are recommended.

Regional Strategy (RS)	The AAP is in general conformity with the RS.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations.	The AAP complies with the Act and the Regulations.

## **Overall Conclusion and Recommendation**

- 74. The Barton Area Action Plan Local Plan has a number of deficiencies in relation to soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.
- 75. The Council has requested that I recommend main modifications to make the plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix to this report the Barton Area Action Plan Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Shelagh Bussey

Inspector

This report is accompanied by the Appendix containing the Main Modifications.

# Appendix – Main Modifications

The modifications below are expressed either in the conventional form of strikethrough for deletions and <u>underlining</u> for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

Main Modificati	Policy/ Page/	
on number	Para.	Detail of Main Modification
MM1	Spatial Vision 2.5	Insert new text: "National Planning Policy Framework Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally." Insert new policy: Policy MP1: When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work propositively with applicants is inthe to find colutions which mean
		<ul> <li>Policy Framework. It will work proactively with applicants jointly to find solutions which mean that applications for sustainable development can be approved where possible, and to secure development that improves the economic, social and environmental conditions in the area.</li> <li>Planning applications that accord with Oxford's Local Plan* (and, where relevant, with neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</li> <li>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, and unless:         <ul> <li>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</li> <li>Specific policies in that Framework indicate that development should be restricted.</li> </ul> </li> </ul>

		Local Plan 2001-2016. When this Plan and the Sites and Housing Plan are adopted they will form part of Oxford's Local Plan.
MM2	Map 1 and Map 6	<ul> <li>Amend Map 1:</li> <li>a. To show boundary of Strategic Site</li> <li>b. Amend description of dark green line on Key to read 'Existing pedestrian <u>and/or</u> cycle ways' and reduce the length of the arrows</li> <li>c. Delete arrows used to depict 'Access to countryside'</li> <li>d. Correct depiction of link through centre of site (past substation) from a lime green dotted line, to a dark green line as it is an existing pedestrian and/or cycle way.</li> <li>e. Reposition existing footpath along northern boundary of site</li> <li>f. Amend key to read "possible pedestrian and cycle crossing" at Stoke Place</li> <li>g. Remove the small purple arrows from the purple lines "potential frontages" parallel to the A40 <i>See new Map 1 appended to this schedule</i></li> <li>As a consequence of above changes, amend Map 6:</li> <li>h. Amend description of dark green line on Key to read 'Existing pedestrian <u>and/or</u> cycle ways' and reduce the length of the arrows</li> <li>i. Correct depiction of link through centre of site (past substation) from a lime green dotted line, to a dark green line as it is an existing pedestrian and/or cycle way.</li> <li>j. Reposition existing footpath along northern boundary of site</li> <li>k. Amend key to read "possible pedestrian and/or cycle way.</li> </ul>
ММЗ	New para. after 4.1	Insert new paragraph: <u>"This Area Action Plan does not allocate any sites within the Old Headington Conservation Area for development.</u> <u>Any development proposals that come forward within the conservation area would have to demonstrate to the City</u> <u>Council that the statutory requirement to preserve or enhance the conservation area would be satisfied. The City</u> <u>Council will take the same approach when considering any development proposals in the Old Headington</u> <u>Conservation Area as it would in conservation areas elsewhere in the city. Any such proposals will be assessed</u> <u>against the relevant policies of Oxford's Local Plan particularly policy CS18 of the Core Strategy and saved policies of</u> <u>the Oxford Local Plan 2001-2016; in addition the Conservation Area Appraisal would be a material consideration."</u>
MM4	BA1	Amend Policy and supporting text:

Content	"Section 5 Integration with surrounding areas and the rest of Oxford
S	
2.2	It is important that the new neighbourhood feels part of Oxford.
5.11 7.19	The place-shaping policies in this Plan aim to foster the sense of community that will be generated by people living
9.5	in the new and existing homes. There could be changes to Tthe A40 ring-road to improve the overall environment
Annex 5	such as the provision of will be transformed to reduce the sense of segregation it currently creates.into a street that runs through the city rather than dividing it. There will be excellent high quality new links across/over the ring-road for pedestrians and cyclists, and improved public transport links. The local centre and community facilities will be easily accessible and new homes will be well related to existing homes in Barton. The City Council will work closely with the Highway Authority in pursuit of these aims.
	Transforming tThe A40 ring-road
	<ul> <li>5.1 The A40 ring-road runs immediately to the south of the strategic development site, forming part of the strategic highway network. Our policy for this stretch of the ring-road is <u>important</u>crucial to achieving the Plan's wider vision and objectives.</li> </ul>
	<ul> <li>5.2 Comprising dual carriageway with a maximum speed of 70 mph, the ring-road creates a sense of severance and isolation. It forms a noisy barrier physically separating the strategic development site from communities in Northway, Headington and the rest of Oxford. Leaving this stretch of the ring-road as it is would make it much harder to integrate old and new. Change would offer opportunities to:         <ul> <li>reduce noise levels for existing communities</li> </ul> </li> </ul>
	<ul> <li>make best use of land, by increasing the amount of land available for development</li> <li>improve connectivity.</li> </ul>
	<ul> <li>5.3 The ring-road will be <u>Our aspiration is to change the ring-road to reduce noise, make it more physically</u> <u>attractive and help integrate development with the wider urban fabric.transformed the ring-road to ensure it</u> is no longer a noisy and visually dominating physical barrier that separates Barton and its surroundings from the rest of the city. This will be <u>We will seek to</u> achieved this in the following three ways:</li> <li><u>Reducing t</u>Traffic speeds will be reduced to a maximum of 40 mph.</li> </ul>
	Lower traffic speeds will reduce noise levels for the new development as well as for those living in surrounding communities. The amount of developable land <u>wouldwill</u> be increased by allowing development to take place closer to the ring-road. The lower speeds <u>wouldwill</u> allow traffic management measures in the form of a new signal-controlled junction or roundabout on the A40 ring-road and multiple safe and easy-to-use crossings for pedestrians and cyclists. <u>Physical measures to the A40 to</u>
	slow down traffic could also include changes to lane widths, the use of surface materials, street furniture and signage. Together <u>T</u> these measures <u>would</u> will help to transform the look, feel and operation of this

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Policy BA1: T <del>ransforming t</del> he ring-road
In order to secure a reduction in traffic speeds, traffic management and safety measures will be put in place and design principles applied to the A40 ring-road between the western approach to the new junction/roundabout and the Headington roundabout.
Innovative solutions to the form and layout of development will be sought to facilitate integration and secure good quality living conditions, especially adjacent to the A40 ring-road. There may be an opportunity to provide homes adjacent to the northern side of the ring-road; however such development must not be accessed directly from the ring-road
Development on the strategic site must be set behind a buffer to the A40 ring-road. This should include a combination of landscaping, open space, pedestrian/cycle ways and a service road and informal car parking where appropriate.
The landscaping of the central reservation and either side of the ring-road should be managed in order to facilitate safe movement and access for all modes of travel.
Where relevant, any development adjacent to the ring-road and any changes to the existing landscaping must consider views into and out of the Old Headington Conservation Area.
Consequential changes:
Amend contents: "Section 5 Integration with surrounding areas 15 – <del>Transforming</del> t <u>T</u> he A40 ring-road"
Amend paragraph 2.2: "It will be integrated with the neighbouring communities. The stretch of the ring-road between a new junction and the Headington Roundabout will change in character. Lower speeds and less traffic noise <u>could</u> —will allow development to front onto adjacent to the ring-road, reducing its visual dominance and the sense of separation. New development <u>adjacent to</u> fronting the ring-road, Barton Village Road, key open spaces"
Amend paragraph 5.11: "This is to help ensure integration by allowing new residential development alongside Barton and <u>potentially</u> the creation of <u>dwellings adjacent to</u> <del>frontages along</del> the ring-road <del>to help transform it into a street</del> ."

		Amend paragraph 7.19: "To help ensure that the linear park along Bayswater Brook is safe, attractive and well used, it should be fronted by residential development with views over the countryside. There should also be residential frontages onto the allotments and Barton Village Road and <u>potentially</u> homes <u>adjacent to</u> the northern side of the ring-road. The security arrangements for the existing allotments should be reviewed to ensure the right balance of security, accessibility and design."
		Amend paragraph 9.5: "The new approach to the ring-road, with lower traffic speeds and consequently less traffic noise, will reduce the sense of severance between Barton and the rest of the city. Pedestrian and cycle crossings will be easier, and new homes in Barton <u>could</u> will front onto be located <u>adjacent to</u> the ring-road, facing the city, so the residents feel part of it."
		Annex 5 - Delete indicator and target: <u>"Transforming the ring-road – Traffic Speeds between the western approach to the new junction/roundabout and</u>
		Headington roundabout - Maximum permitted traffic speed to 40 mph"
MM5	BA2	Additional wording at end of policy:
		'To minimise disruption to sports provision the groundworks needed to re-configure the recreation ground should take place in the off-season.'
MM6	BA7	Amend Policy and supporting text:
		"Pedestrian and cycle links
		5.31 The ring-road currently imposes a significant barrier for pedestrians and cyclists, with only one existing grade-separated (differing levels) crossing point – a subway to the south of Barton, which provides a link to Headington.
		5.32 To improve integration and permeability and to promote maximum usage, a network of safe and easy-to-use pedestrian and cycle routes along desire lines (the routes people are likely to take, with or without a formally designated path) is needed to connect the new homes with facilities in the new neighbourhood and link the new development to its surroundings in Barton, Headington, Northway and the countryside beyond Oxford, and to the rest of the city. There will be multiple safe and convenient pedestrian and cycle crossing links across/over points on the ring-road.
		5.33 The existing footpath that runs <u>south-north-north-south</u> across the strategic development site (and then beyond into the countryside in South Oxfordshire) <u>couldwill</u> be re-connected with Stoke Place linking the footpath with the public bridleway and byway that continues south into Old Headington along Stoke Place. <u>AThe</u> re-connected link <u>wouldwill</u> provide the new development with a direct pedestrian and cycle route to

	the shops and other facilities in Headington, the John Radcliffe Hospital and Cheney Secondary School. It <u>wouldwill</u> open up access to the countryside in South Oxfordshire for those living in Headington. Stoke Place <u>would</u> will need to be upgraded to an appropriate standard, with changes to the surface, thinning of trees and vegetation and installation of sensitive street lighting. The nature of the changes to Stoke Place, together with the design, and siting and type of crossing, should respect the character of Old Headington Conservation Area.
5.34	The new vehicle junction or roundabout on the ring-road will include pedestrian and cyclist crossing phasing and facilities. The new development is an opportunity to improve the existing crossing to the south of Barton. This could be in the form of further improvements to the subway or a parallel surface level crossing. There could be at least one other new pedestrian and cycle <u>link overcrossing of</u> the ring-road. <del>linking the strategic development site with its surroundings.</del> One potential <u>locationcrossing point</u> is from the new development to Foxwell Drive in Northway which would provide direct access to the wider cycle network and the city centre. Map 6 shows how the strategic development site will be accessed by vehicles, pedestrians and cyclists."
	<ul> <li>Policy BA7: Pedestrian and cycle links</li> <li>New direct, safe and attractive cycle and pedestrian links will be provided as part of the strategic development, including: <ul> <li>re-connecting Stoke Place bridleway with the existing footpath running north-south across the strategic development site</li> <li>upgrading Stoke Place to an appropriate standard for a cycle route and footpath and in a manner that is sensitive to Stoke Place's role and character in the Old Headington Conservation Area</li> <li>a crossing of the A40 ring-road included in the new junction or roundabout</li> <li>enhancement of the existing crossing between Barton and Headington</li> <li>links between the new development and existing rights of way in the surrounding countryside</li> <li>giving priority to walking and cycling routes in the development, including connections to key destinations such as the local centre, community hub and Barton and the links across the A40 ring-</li> </ul> </li> </ul>

		<ul> <li>road</li> <li>a street network that is designed to be fully cycle and pedestrian friendly.</li> <li><u>There may be an opportunity to re-connect Stoke Place bridleway with the existing footpath running north-south across the strategic development site. Any link would need to ensure safety for all users. It would require the upgrading of Stoke Place to an appropriate standard for a cycle route and footpath in a manner that is sensitive to Stoke Place's role and character in the Old Headington Conservation Area.</u></li> </ul>
MM7	BA13 3 <sup>rd</sup>	Additional wording at end of 3 <sup>rd</sup> bullet point:
	bullet point	"The development's scale, form, character and design must respect the site's topography, natural features and setting of the site, including the impact on the Old Headington Conservation Area <u>and its setting."</u>
MM8	New Annex	Addition: <u>Annex 3 - Housing Trajectory</u> . See new appended to this schedule

MM2: New Map 1 and associated key



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Develo	pment Site Boundary
AAP Ar	ea
Bayswa	ater Brook
A40	
Key Ro	utes
	ive Location of Signalised on or Roundabout
Existing	Pedestrian and/or Cycleways
	ial Additional Linkages for rians and Cycles
	éhicle Access to Strategic prment Site
Potenti	ial Additional vehicle access point
Indicta	tive Route for Primary Street
Possibl	e Pedestrian and Cycle Crossing
Allotme	ent Association Land
Linear	park
Open S	space
Potent	ial Frontages

Existing Pedestrian Subway

#### MM6 – New Annex

### **Annex 3 - Housing Trajectory**

The housing trajectory demonstrates the position based upon the Strategic Housing Land Availability Assessment (Dec 2011) with the addition of sites proposed to be allocated in the Sites and Housing Plan. Barton falls within years 2014/15 and 2019/20. No allowance has been made for windfalls.





#### Housing trajectory data against Core Strategy target of 8,000 dwellings from 2006-26

	2006/	2007/	2008/	2009/	2010/	2011/	2012/	2013/	2014/	2015/	2016/	2017/	2018/	2019/	2020/	2021/	2022/	2023/	2024/	2025/	Totals
	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	
Sites and Housing allocations (deliverable)							200	453	765												1418
Sites and Housing allocations (developable)								127	125	390	140			100							882
West End AAP sites								50	393	145	145	27									760
Core Strategy strategic sites (Barton and Northern Gateway)									100	375	200	200	175	150							1200
Former Local Plan sites						17	40	12		10			70								149
Employment sites							10				16										26
Commitments (large sites)						60	60	63													183
Commitments (small sites)						80	80	85													245
Sites where permission refused but principle acceptable								13													13
Suitable sites pending decision									32												32
Basic desktop study						55		10	57		200										322
Windfall sites																					0
Actual completions	821	529	665	257	200	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2472
Total projected completions	-	-	-	-	-	212	390	813	1472	920	701	227	245	250	0	0	0	0	0	0	5230
Cumulative completions	821	1350	2015	2272	2472	2684	3074	3887	5359	6279	6980	7207	7452	7702	7702	7702	7702	7702	7702	7702	7702
Housing target	400	400	400	400	400	400	400	400	400	400	400	400	400	400	400	400	400	400	400	400	8000
Cumulative requirement	400	800	1200	1600	2000	2400	2800	3200	3600	4000	4400	4800	5200	5600	6000	6400	6800	7200	7600	8000	8000
Monitor	421	550	815	672	472	284	274	687	1759	2279	2580	2407	2252	2102	1702	1302	902	502	102	-298	
Manage	400	378	369	352	358	369	380	379	343	240	172	113	99	78	50	60	75	99	149	298	298