



The Planning Inspectorate

Report to Vale of White Horse District Council

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an Inspector appointed by the Secretary of State

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Vale of White Horse Local Plan 2031: Part Two

The Plan was submitted for examination on 23 February 2018

The examination hearings were held between 3-5 & 24-27 July, 4-6 September 2018

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Abbreviations used in this report

AONB	Area of Outstanding Natural Beauty
Barracks/Airfield	Dalton Barracks/Abingdon Airfield
DtC	Duty to Co-operate
HRA	Habitats Regulations Assessment
LPP1	Vale of White Horse Local Plan Part One
LPP2	Vale of White Horse Local Plan Part Two
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
OGB	Oxfordshire Growth Board
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
The Vale	The Vale of White Horse District
2011 Local Plan	Vale of White Horse Local Plan 2011
The 2004 Act	The Planning and Compulsory Purchase Act 2004
The 2012 Regulations	The Town and Country Planning (Local Planning) (England) Regulations 2012
WRMP	Water Resources Management Plan 2019

Non-Technical Summary

This report concludes that the Vale of White Horse Local Plan 2031: Part Two (LPP2) provides an appropriate basis for the planning of the district alongside the existing Vale of White Horse Local Plan 2031: Part One (LPP1) provided that a number of main modifications (MMs) are made to it. The Vale of White Horse District Council has specifically requested me to recommend any MMs necessary to enable the plan to be adopted.

All the MMs concern matters that were discussed at the examination hearings or in writing and were published for public consultation for a six-week period from 18 February to 1 April 2019. The Council carried out sustainability appraisal (SA) of the MMs and an update to the Habitats Regulations Assessment (HRA) was also prepared. I have recommended the inclusion of the MMs in the plan after considering all the representations made in response to consultation on them, the SA and updated HRA. In two cases (MM27 and MM28) I have amended their wording to address concerns relating to air quality in Marcham.

The Main Modifications can be summarised as follows:

- The adjustment of the sub area housing requirement figures;
- Revisions to the Green Belt inset boundary and housing allocation at Dalton Barracks/Abingdon Airfield;
- Deletion of the major housing allocation in the Area of Outstanding Natural Beauty (AONB) at Harwell Campus;
- Certain amendments to the policies relating to other housing allocations;
- Certain amendments to the policies and areas safeguarded for necessary infrastructure schemes; and
- Certain amendments to development management policies.

Introduction

1. This report contains my assessment of the Vale of White Horse Local Plan 2031: Part Two (LPP2) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended) (the 2004 Act). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework 2012 (paragraph 182) makes it clear that in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy.
2. The revised National Planning Policy Framework (NPPF) was published in July 2018 and further revised in February 2019. It includes a transitional arrangement in paragraph 214 which indicates that, for the purpose of examining this plan, the policies in the 2012 NPPF will apply. Similarly, where the Planning Practice Guidance (PPG) has been updated to reflect the revised NPPF, the previous versions of the PPG apply for the purposes of this examination under the transitional arrangement. Therefore, unless stated otherwise, references in this report are to the 2012 NPPF and the versions of the PPG which were extant prior to the publication of the 2018 NPPF.
3. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The LPP2 submitted in February 2018 is the basis for my examination. It is the same document as was published for consultation in October 2017.
4. The LPP2 is intended as a complementary plan to the Vale of White Horse Local Plan 2031: Part One (LPP1) which was adopted in December 2016 and will remain in force.
5. On adoption of the LPP2, the remaining saved policies of the Vale of White Horse Local Plan 2011 (the 2011 Local Plan) will be replaced except for Policy H5: Grove Airfield, which is included in Appendix E of the LPP2.

Main Modifications

6. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings or in writing, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
7. Following the examination hearings and in collaboration with me, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal (SA) of them. The MM schedule was subject to public consultation for six weeks from 18 February to 1 April 2019. The consultation was accompanied by an addendum to the original SA, a statement to inform the Habitats Regulations Assessment (HRA) and additional transport and air quality evidence in support of the allocation at Dalton Barracks/Abingdon Airfield. I have taken account of the consultation responses, the SA, HRA and additional evidence in coming to my conclusions in this report and in this light I have made amendments to the wording of MM27 and MM28 to address concerns

relating to air quality in Marcham. Neither of these amendments significantly alter the content of the modifications as published for consultation or undermine the participatory processes and SA that has been undertaken. They are referred to in the appropriate part of the report.

Policies Map

8. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises three plans entitled: Local Plan 2031 Draft Adopted Policies Map - Abingdon-on Thames and Oxford Fringe Sub-Area, South-East Vale Sub-Area and Western Vale Sub-Area.
9. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend MMs to it. However, a number of the published MMs to the plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are justified. These further changes to the policies map were published for consultation alongside the MMs in the document 'Schedule of Draft Maps and Figures'.
10. When the plan is adopted, in order to comply with the legislation and give effect to the plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the three plans entitled Local Plan 2031 Draft Adopted Policies Map - Abingdon-on Thames and Oxford Fringe Sub-Area, South-East Vale Sub-Area and Western Vale Sub-Area together with the further changes published alongside the MMs in the Schedule of Draft Maps and Figures.
11. On the submission policies map the Council included a 'correction' to the Green Belt boundary at North Hinksey Village. However, this did not relate to any proposal in the LPP2 and was not therefore considered during the examination. The Council confirmed, without prejudice, that it would delete the correction on the submitted map.

Assessment of Duty to Co-operate

12. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with the duty to co-operate (DtC) imposed on it by section 33A in respect of the plan's preparation. The Council is obliged to co-operate with relevant local authorities and other prescribed bodies in relation to cross boundary strategic matters in order to maximise the effectiveness of the plan.
13. In Topic Paper 1 on the DtC and the Statement of Compliance with the DtC the Council set out the local authorities where the duty most directly applies and other prescribed bodies with whom it has worked to prepare the plan. These describe the on-going engagement and liaison that has been undertaken as

well as formal consultation at the Preferred Options and Publication Version stages. A series of Statements of Common Ground confirm the level of co-operation that has been involved and demonstrate there are no significant areas of dispute.

14. Most cross boundary strategic matters have already been addressed in the adopted LPP1 which was itself prepared in accordance with the DtC. During preparation of the LPP2, four strategic matters have required co-operation, namely addressing the unmet housing needs of Oxford City, the strategy for Didcot Garden Town, co-ordinating transport infrastructure and avoiding the impact of growth on the Oxford Meadows Special Area of Conservation (SAC).
15. The process for addressing the unmet housing needs of Oxford City has been overseen by the Oxfordshire Growth Board (OGB), a joint committee of the six Oxfordshire authorities and other key strategic partner bodies. The 2013 'Statement of Co-operation' set the basis for the OGB managing the outcome of the jointly commissioned Oxfordshire Strategic Housing Market Assessment (SHMA), following which a programme of work and further studies enabled the OGB to reach agreement in September 2016 on the amount of unmet need and its apportionment between districts. The resulting 'Memorandum of Co-operation' confirms the figures and the mechanism for each Council to ensure delivery, in the case of the Vale by preparing the LPP2. The co-operation through the OGB was supplemented by bilateral meetings with Oxford City Council to agree an appropriate distribution of housing allocations and the arrangements to provide affordable housing which form an important component of Oxford's unmet needs.
16. The area designated as Didcot Garden Town in 2015 crosses the boundary into South Oxfordshire. Joint working between the two Councils, County Council and other bodies has been on-going to establish a consistent approach and masterplan for the town. This led to the Joint Didcot Garden Town Delivery Plan in 2017, the agreed principles set out in LPP2 Figure 2.7 and the commitment to prepare a joint Development Plan Document.
17. In relation to transport infrastructure joint working with the County Council led to the LPP2 Evaluation of Transport Impact report, the safeguarding of land for strategic highway schemes including park and ride sites to serve Oxford and an agreed Local Transport Plan. Engagement with bus companies to improve services alongside new development and Network Rail to reopen Grove Station are other examples of co-operation. The Council works through the OGB to jointly oversee the Oxfordshire Infrastructure Strategy and the Oxfordshire Housing and Growth Deal with government to prioritise and deliver key projects across the County.
18. A small part of the Oxford Meadows SAC is threatened by air pollution from increasing traffic flows on the adjacent A34 and A40 caused by additional development across Oxfordshire. Both directly and as part of the OGB the Council has worked with Natural England to monitor air quality at the site, model future air pollution levels, identify potential mitigation measures and undertake the necessary HRA of the plan.

19. I am therefore satisfied that, overall and where necessary, the Council has engaged constructively, actively and on an on-going basis in the preparation of the plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Background

20. Importantly, the LPP2 is intended as a complementary plan to the LPP1 which was adopted in December 2016 and will remain in force. The LPP2 must therefore be consistent with the LPP1 to comply with Regulation 8(4) of the 2012 Regulations. With one exception, the LPP1 establishes the overall spatial strategy and strategic policies to deliver sustainable development across the district up to 2031 and sets the context for the LPP2. The exception is that the LPP1 did not establish any strategy for meeting the unmet housing needs of Oxford City in the district, leaving this matter for resolution in the LPP2.
21. The LPP2 includes four objectives, namely to set out policies and locations for new housing to meet the unmet needs of Oxford City, to make additional housing allocations to complement those in the LPP1, to set policies for Didcot Garden Town and to establish detailed development management policies.

Main Issues

22. Taking account of all the representations, written evidence and the discussion that took place at the examination hearings I have identified seven main issues upon which the soundness of the plan depends. Under these headings my report deals with the main matters of soundness and legal compliance rather than responding to every point raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

Issue 1 – Whether the overall requirement for housing in the plan is consistent with that in the adopted LPP1 and the additional requirement to ensure the housing needs of Oxford City will be met is justified

23. The LPP1 sets, in Policy CP4, an objectively assessed need (OAN) for 20,560 dwellings for the Vale of White Horse District during the plan period 2011-31, an average of 1,028 pa. This figure was criticised during the examination as being based on an out of date housing market assessment and over optimistic growth assumptions, but there is no remit for the LPP2 to revisit the matter. To ensure a sustainable geographic distribution, LPP1 Policy CP5 earmarks 11,850 of these for the 'Science Vale' ring fence area to match new jobs in the area with the greatest opportunities for economic development. This leaves 8,710 dwellings to be provided in the 'rest of the district'. Again, there is no basis for the LPP2 to revisit this approach and no evidence to suggest jobs growth in the Science Vale is departing significantly from that forecast. Housing land supply is monitored separately for the Science Vale and the 'rest of district' with the combined figures giving the overall position.

24. The LPP1 also settles the overall planning strategy and settlement hierarchy for the district with separate roles identified for three distinctive sub areas, Abingdon & Oxford Fringe, South East Vale and Western Vale. Although not monitored by these sub areas, indicative housing requirements for each area are included in Policies CP8, CP15 and CP20. However, these total 21,061 rather than the OAN for the Vale as a whole. The Council rightly propose to correct this anomaly but their suggestion, a pro-rata reduction between the LPP1 and LPP2 figures for each sub-area, fails to do so. The South East Vale is only slightly larger than the Science Vale ring fence area but the indicative housing requirement is 600 more. Any reduction in the housing figures for the Abingdon & Oxford Fringe or Western Vale sub areas would be inconsistent with the spatial strategy of the LPP1 and they should therefore remain at 5,438 and 3,173 respectively. The housing figure for the South East Vale should instead be reduced to 11,949, only slightly higher than the Science Vale, and more appropriate considering the character of Blewbury, a village within the North Wessex Downs AONB which is the only difference between the two areas. These adjustments are included in **MM3**, **MM8** and **MM13** for consistency with the LPP1 but do not affect the housing figures for the two areas which are used for monitoring housing land supply.
25. However, the unmet housing needs of Oxford City, the amount of this to be met within the Vale and the spatial strategy and allocations for doing so were not settled by the LPP1. These matters were left for the LPP2 in accordance with the commitments set out in LPP1 Policy CP2. The examination of the Oxford City Local Plan has only recently commenced, but the OGB has overseen an objective and robust work programme to determine both the quantum of this unmet need and its apportionment between the relevant districts. This work enabled the LPP2 to be submitted within the deadline set by LPP1 Policy CP2.
26. The starting point for this work was the Oxfordshire SHMA and the Cundall report, a critical review of the housing potential of Oxford City. Together these enabled the OGB to agree a 'working assumption' that the housing needs of Oxford City which needed to be met in adjacent districts was 15,000 over the plan period. The Oxford Spatial Options Assessment, supported by a range of other evidence including a Green Belt study, was then undertaken to inform the apportionment of this figure between the districts. This work was necessarily high level and strategic in nature, only looking at large site options, but was only intended to provide district figures for subsequent local plans to take forward. The culmination of this work programme was agreement by the OGB in September 2016 as to how the 15,000 figure was to be apportioned, the agreed figure for the Vale being 2,200 dwellings.
27. Whilst criticised in representations, there is no relevant guidance in place and the process was both logical and comprehensive, considering an appropriate range of assessment criteria. The exercise was carried out jointly with full agreement between the Councils concerned and overseen by the OGB. There is no reason to depart from the conclusions of the OGB which provide a robust basis to prepare and adopt the LPP2 to provide additional housing land to meet the needs of Oxford as soon as possible as required by LPP1 Policy CP2.
28. The figure of 2,200 dwellings is therefore justified as the basis for meeting the housing needs of Oxford City in the LPP2. However, this figure has the status

of a working assumption at this stage to be confirmed or adjusted through examination of the Oxford City Local Plan and then the preparation of the Oxfordshire Joint Spatial Strategy. Added to the OAN of 20,560 dwellings for the Vale's own needs, the total housing requirement to be provided in the district should therefore be 22,760 as included in LPP2 Policy CP4a. In accordance with the provisions of Policy CP2, these 2,200 dwellings should be provided during the remainder of the plan period, 2019-31, increasing the annual requirement to 1,211 pa over that period.

29. The strategy of the LPP2, which is fully supported by Oxford City Council, is to accommodate the unmet housing needs of Oxford City within the area closest to Oxford, namely the Abingdon & Oxford Fringe sub area. Didcot and some other parts of the South East Vale, and even parts of the Western Vale, have good transport links to Oxford and are therefore likely in practice to accommodate some of its open market housing needs. However, much of Oxford's housing needs are for affordable housing, particularly social rented housing, which is to be provided on specific sites in the Vale by agreement between the two Councils. Such occupiers should have the opportunity of accommodation in locations particularly closely connected to Oxford.
30. In any event, the pattern of development should minimise the need to travel overall. This justifies a distribution of the 2,200 dwellings skewed towards Oxford compared to the distribution of the housing allocations to meet the needs of the Vale established by the LPP1. For these reasons, the principle set out in the LPP2 that the additional dwellings should be provided in the Abingdon and Oxford Fringe sub area is justified. This increases the overall requirement in that area to 7,638 and in the 'rest of the district' monitoring area to 10,910, the extra dwellings to be delivered between 2019-31.
31. The LPP1 already allocates a number of large housing sites that are closely connected to Oxford which could notionally assist in meeting the identified requirement. These are listed in LPP2 table 2.1 and include two sites north of Abingdon, a site in north west Radley and one south of Kennington. With no controls on occupation of the market housing and an agreement between the Councils to allocate some social homes to Oxford City residents, these sites will in practice contribute towards meeting Oxford's needs. Together with the LPP2 allocation dealt with under Issue 2, these will provide more than the 2,200 dwellings that are necessary near to Oxford. Further allocations will however be necessary elsewhere in the sub area to meet the Vale's needs.
32. LPP1 Policy CP27 requires the provision of at least 13 pitches for gypsies and travellers during the plan period through existing permissions, the extension of existing sites and allocating any remaining sites in the LPP2. However, as submitted, the plan is silent on the matter. A further assessment carried out in 2017 now demonstrates that only one further pitch is required in the latter part of the plan period (after 2027). This pitch can potentially be provided by allowing a windfall site under the criteria in Policy CP27 so no allocation is necessary at this time. **MM1** adds additional text to the plan to ensure the LPP2 is consistent with the LPP1 in this respect.
33. In conclusion, subject to **MM1**, **MM3**, **MM8** and **MM13**, the overall requirement for housing in the plan is consistent with that in the adopted LPP1 and the additional requirement to ensure the housing needs of Oxford City will be met is justified.

Issue 2 – Whether there are exceptional circumstances to justify an alteration to the Green Belt at Dalton Barracks/Abingdon Airfield/Shippon and whether the housing allocation is justified, effective and consistent with national policy

34. In order to provide the necessary housing, the most far reaching proposal in the Abingdon and Oxford Fringe sub area is to delete a large area at Dalton Barracks/Abingdon Airfield (hereafter the Barracks/Airfield) from the Oxford Green Belt to designate a strategic housing allocation. The adjacent village of Shippon, currently included in the Green Belt, would also be excluded.
35. Policy CP13a proposes this deletion whilst Policies CP4a and CP8a allocate the Barracks/Airfield area for 1,200 dwellings during the plan period. However, as the LPP2 makes clear, the area of land excluded has the capacity to deliver significantly more housing in the period beyond 2031 'subject to the provision of appropriate infrastructure'. Paragraph 2.63 states the potential of the overall site is in excess of 4,000 dwellings, whilst the masterplanning carried out by the site promoter puts the figure at 4,500 dwellings. A new settlement described in the plan as 'a highly sustainable mixed-use development incorporating garden village principles' is envisaged for the site.
36. The NPPF makes clear that the essential characteristics of Green Belts are their openness and their permanence and, once established, their boundaries should only be altered in exceptional circumstances through a local plan. Four alterations to the Green Belt were made through the LPP1 to provide a range of housing allocations, but that plan envisaged further alteration(s) might be necessary in the LPP2. The quantum of additional housing now needed for Oxford City, and the locational requirement for this to be closely connected to Oxford, amounts to exceptional circumstances that justify the principle of one or more further alterations to the Green Belt. There are some opportunities for allocations in the Abingdon and Oxford Fringe sub area beyond the Green Belt and these are made in the LPP2 (see Issue 4). However, these are limited in extent and less well related to the City, which means they are only suited to meeting the housing needs of the Vale.
37. The opportunity for a strategic housing allocation in the area arises from the unexpected announcement by the Ministry of Defence in November 2016 that the Barracks/Airfield site would be fully released in 2029 with subsequent clarification that land outside the secure operational area would be available for development earlier. The site was not considered during the preparation of the LPP1 nor included in the Oxford Spatial Options Assessment as it was not then known to be available, but its release offers the potential for a large-scale comprehensively planned development well related to Abingdon, the largest town in the Vale, and Oxford. This provides an opportunity to deliver a substantial quantum of housing with one strategic alteration to the Green Belt rather than a number of smaller alterations like the LPP1. This approach would better protect the integrity of the Green Belt as a whole.
38. Whilst representations raise concerns about the availability of the site in the necessary timescale, the Defence Estate white paper is definitive and the disposal is now on the official list reported quarterly to parliament. Not only would the site form part of a government commitment to release public land for 55,000 houses, it would be in the interests of the military and the units

concerned to relocate to more suitable, modern accommodation elsewhere. Plans for this re-provision are well advanced albeit not yet public. The July 2018 letter from the Defence Infrastructure Organisation confirms the availability of the land for the initial phases of development in 2024/25 while the secure barracks site would still be in occupation prior to complete release by 2029.

39. As submitted, the Green Belt alteration and strategic allocation includes both the built-up area of Dalton Barracks with its numerous military buildings and a large part of the ex-RAF airfield to the north and west. The site thus extends north towards Wootton, north-west towards Cothill and west towards the hamlet of Gozzards Ford, but a wide area of land would be retained in the Green Belt between the allocation and those settlements to prevent any danger of coalescence and provide a substantial country park as a feature of the new settlement and a major new facility for the area.
40. The Oxford Green Belt has been the subject of an extensive range of reviews including a review of the Green Belt within the Vale to inform the preparation of the LPP1 and a high-level strategic review of the Green Belt as a whole to inform the work of the OGB. Following the decision to release the Barracks/Airfield site, a further study of local plan sites was undertaken for the LPP2, a Green Belt appraisal for the site promoter and a detailed exceptional circumstances assessment to examine the case for an alteration to the Green Belt at the Barracks/Airfield site. There are some differences between the conclusions of these reviews but any assessment of the various sites' contribution to the purposes of the Green Belt is to a degree subjective.
41. The latest studies conclude that the previously unexpected availability of the site is a major change in circumstances, that the extensive built up Dalton Barracks and adjacent village of Shippon already result in a significant loss of openness, and that the Barracks/Airfield site provides a unique opportunity to develop a sustainable new community well related to Abingdon and Oxford on a large area of essentially previously developed land with only a limited impact on the landscape. The area contributes to the purposes of the Green Belt, mainly by safeguarding the countryside from encroachment, but its deletion would only have a limited impact on the integrity of the Green Belt compared to the combined effect of deleting several alternative sites. The findings of the latest studies are thus well founded and amount to exceptional circumstances that justify an alteration to the Green Belt at the Barracks/Airfield site.
42. However, whilst the concept of a strategic housing allocation is justified, the proposal as submitted is unsound in some respects and requires modification. The proposal as submitted is to remove Green Belt designation from an area large enough to accommodate a new settlement of up to 4,500 dwellings but only to allocate the site for 1,200 dwellings at this stage with policy criteria to judge any larger proposals which might come forward. No mechanism is proposed to limit development on the site to 1,200 dwellings and indeed, this is not intended. There is no comprehensive evidence base that the whole area is developable and able to satisfactorily accommodate a new settlement of up to 4,500 dwellings in the long term. A series of criteria setting out the tests that would be applied to determine whether this amount of housing could be provided, however carefully formulated, leaves the possibility that the criteria

may not be met. In those circumstances the extent of the alteration to the Green Belt would have been abortive and, with hindsight, not justified.

43. The LPP2 as submitted is also unsound in relation to the effectiveness of Policy CP8b in guiding the development of the Barracks/Airfield site. Whilst Policies CP4a and CP8a allocate the site for only 1,200 dwellings, Policy CP8b requires proposals to contribute to a comprehensive development of the whole site by being in accordance with a comprehensive development framework to be prepared in the form of a supplementary planning document (SPD). This will include the need for a travel plan for the whole site to minimise car usage and a comprehensive landscape plan including provision of a large country park. It appears that the SPD will provide guidance for the development of the whole site, not just the allocation for 1,200 dwellings, and thus go beyond the proposals in the LPP2. Policy CP8b also appears to be delegating policy requirements to a future SPD and elevating this to the status of development plan policy, which is not possible. Instead, to be effective in achieving its aims, policies which are intended to guide the determination of planning applications should be included within the LPP2. The approach in the plan as submitted could exceed the remit of an SPD set out in the Town and Country Planning Regulations 2012 and hence be open to challenge.
44. One solution to these soundness issues would have been to further develop the evidence base to support an unambiguous proposal for a new settlement of up to 4,500 dwellings on the Barracks/Airfield site, albeit on the basis that only an estimated 1,200 dwellings would be completed during the plan period. This would also have allowed the preparation of an SPD to guide development of the whole site to accord with the 2012 Regulations. Although the Council was invited to consider this option following the examination hearings, it was resolved instead to amend the proposals to a straightforward allocation for 1,200 dwellings on part of the airfield to the west of the built-up part of the barracks for development during the plan period. For this quantum of housing there is a substantial evidence base which was later supplemented by further evidence on the traffic impacts of the proposal and cumulative impacts on air quality. This change reduces the impact on the purposes of the Green Belt. In line with this decision, the alteration to the Green Belt as modified by **MM5** does not now involve so much of the open airfield. There are no physical features within the airfield to determine the revised Green Belt boundary, it being masterplan led, but the extent of future housing will provide a suitably robust and clear-cut boundary in due course. This approach to the detailed boundary is justified given the exceptional circumstances in this case.
45. However, to be consistent with paragraphs 83-85 of the NPPF, the LPP2 must include an inset boundary that will have permanence in the long term and be capable of enduring beyond the end of the plan period. The Green Belt should not include land which it is unnecessary to keep permanently open. In this context there is general agreement that the built-up part of Dalton Barracks adjacent to the strategic allocation could be redeveloped for housing after 2029 when the army move out. Whilst paragraph 89 of the NPPF allows the redevelopment of previously developed land within the Green Belt, this is subject to their being no greater impact on openness which would reduce the potential for housing on the site, unnecessarily increasing pressure for land releases elsewhere. The built-up part of the barracks makes no significant contribution to the openness of the Green Belt at present and removal of the

designation is therefore justified in the interests of long-term planning in the district.

46. The adjacent village of Shippon is a distinctive settlement closely associated with the barracks and airfield comprising both private sector and military housing and a limited range of facilities including a shop, church and public house. These resulted in its classification as a smaller village in the LPP1 and it is currently 'washed over' by the Green Belt. However, with a large-scale housing allocation and the closure and redevelopment of the barracks, the nature of the settlement will inevitably change.
47. These changed circumstances must be taken into account in determining a Green Belt inset boundary that will endure in the long term. The LPP2 must also be consistent with national policy in paragraph 86 of the NPPF which distinguishes between villages with an open character which make an important contribution to the openness of the Green Belt and those which should be protected for other reasons by normal development management policies and should be excluded. The built-up area of Shippon is relatively densely developed and falls into the latter category like Wootton, Cumnor and Appleton, existing inset villages. These are protected by LPP1 Policies CP37 and CP39 and LPP2 Policies DP29 and DP36 amongst others; these will equally protect Shippon. The exclusion of Shippon from the Green Belt as proposed in the submitted plan is therefore justified.
48. However, the rural setting of the village to the east and south, together with the sports ground on Cholswell Road, are critical to its character and make an important contribution to the openness of the Green Belt. The sports ground forms part of the operational Dalton Barracks site and comprises a playing field with pavilion in one corner but does not meet the definition of previously developed land. Although separated from the farmland to the east by a strong hedgerow and brook, the site has an open character and forms a contiguous and integral part of the open land separating the built-up area of Shippon from the A34 and Abingdon. The removal of the sports ground from the Green Belt is therefore not justified and **MM5** is necessary to reinstate it.
49. Dealing specifically with the strategic housing allocation as amended, the proposal is for 1,200 dwellings on part of the open, flat, relatively featureless airfield to the west of the built-up part of the barracks which has no access for the general public. The amended allocation effectively lies outside the secure operational area, reducing any risk that delays in re-providing accommodation for the military units may hold up delivery of housing on the site. Whether or not the whole airfield comprises previously developed land, the topography of the area means the visual impact of housing on the site would be relatively limited. With landscaping, there would only be glimpses of the new housing through the hedgerows along the roads to the west and north of the site and distant views from the high ground to the north east, but all of these would be seen in the context of the existing barracks. Indeed, the future demolition of the five large hangars on the site would result in a visual improvement.
50. To the north west the site lies close to the Dry Sandford Pit Site of Special Scientific Interest and Cothill Fen SAC but a buffer of parkland, 30 hectares in size, wrapping around the western and northern sides of the development would have ecological benefits, act to divert recreational pressure and help to

screen the site from any views. The parkland would also ensure adequate separation of the new housing from Gozzards Ford and Cothill. To the east the site directly adjoins existing housing in Shippon where landscaping and a sensitive layout will be required to avoid any undue impact on the character of the village, particularly the historic core along Barrow Road.

51. The proposal would incorporate garden village principles, provide 35% (420) affordable homes, at least 30 ha of parkland, other open space, a local centre, two-form entry primary school, contributions to secondary school provision in Abingdon and other community services and facilities. Development of the site would thus benefit the existing residents of Shippon by providing an enhanced range of local facilities, particularly a village primary school which the community currently lacks.
52. The site is well related to both Abingdon and Oxford City with potential for a comprehensive footpath and cycleway network linking the site to surrounding areas. This would include upgrading the existing footpath and overbridge between Shippon and Abingdon to improve access towards the proposed Lodge Hill park and ride. Regular City4 bus services run along Cholswell Road and Wootton Road linking to Abingdon and Oxford City, from where a wide range of destinations can be accessed, and a shuttle bus service linking the site with Abingdon town centre could also be considered. Given the location of the site and the opportunities for new services and facilities to serve the additional population the proposal would reduce the need to travel overall.
53. Vehicular access would be from Barrow Road to the south, which would form the primary access to the A415 and A34, and Faringdon Road to the east. At Barrow Road a change in traffic priority would reduce vehicular movements through the historic part of Shippon. Initial traffic assessment suggests that roundabouts may be required at the Barrow Road/unnamed road and unnamed road/Marcham Road junctions, with potential traffic signals at the Marcham interchange and measures to reduce the impact of extra traffic through nearby villages. To ensure policy effectiveness **MM27** adds these requirements to the site development template.
54. Although only a small proportion of the generated movements, the additional traffic arising from the proposal along the A415 to the west would increase current levels of congestion at the Frilford traffic light junction and air pollution through Marcham. The need to upgrade the Frilford junction prior to the development of the site means house completions are unlikely before 2024/25 when the works are programmed. For effectiveness **MM27** also amends the site development template to restrict the occupation of any dwellings until the upgrade is in place and, in the light of consultation responses, a similar restriction until there is satisfactory air quality mitigation for Marcham.
55. In conclusion, subject to **MM5**, which reduces its extent, there are exceptional circumstances to justify an alteration to the Green Belt at Dalton Barracks/Abingdon Airfield/Shippon. Secondly, subject to **MM4** and **MM27**, which are necessary to delete references to the long-term potential of the strategic housing allocation in favour of a straightforward allocation for 1,200 dwellings in the plan period, the housing allocation is justified, effective and consistent with national policy.

Issue 3 – Whether there are exceptional circumstances and it can be demonstrated to be in the public interest for major housing development to be allocated in the North Wessex Downs AONB at Harwell Campus

56. Policies CP4a and CP15a propose an allocation for 1,000 dwellings at Harwell Campus in the South East Vale which would be guided by the provisions of Policy CP15b and a comprehensive development framework. The proposal is for a bespoke 'Innovation Village' dedicated to support the role of the campus at its northern end on land allocated to date for employment purposes. The site (like the campus as a whole) lies within the North Wessex Downs AONB where paragraph 116 of the NPPF precludes major development other than in exceptional circumstances and where it can be demonstrated to be in the public interest. To be included as an allocation in the LPP2 the evidence must show that the proposal meets these tests. The NPPF also advises that the assessment of such proposals should include the need for the development, the impact on the local economy, the scope for developing outside the AONB or meeting the need in some other way, and the effect on the environment, the landscape and recreational opportunities.
57. Whilst said to be a different proposal, two allocations totalling 1,400 dwellings adjacent to the campus were put forward in the LPP1 for a similar concept, described as a 'work-live-play' community, but these were deleted by the LPP1 Inspector as the need was not sufficiently demonstrated. The two sites were to the north and east of the campus on essentially greenfield land, but the Inspector also considered in paragraph 122 of his final report an alternative proposal in the area of the LPP2 allocation but still concluded that exceptional circumstances would be unlikely to exist. In his interim findings the Inspector invited the Council to consider the need for replacement sites in the LPP2, but this referred to sites in the South East Vale, not sites at the campus.
58. The case for the allocation is set out in the 'Exceptional Circumstances' report prepared by SQW. Harwell Campus is one of the largest and most important sites for scientific research, development and innovation in Europe. Dating back 60 years to the Atomic Energy Research Establishment, the site has seen over £2bn of investment in scientific facilities focussed on the Rutherford Appleton Laboratory including the Diamond Light Source and accommodates key research organisations such as the European and UK Space Agencies, the Medical Research Council and numerous world leading enterprises in the space, life sciences, computing, energy and engineering fields. Overall a complex scientific and research ecosystem of 5,500 highly skilled people and over 225 organisations has built up, and it is said the need now is to support this business activity with a complementary work-live-play residential and community environment to help the campus achieve its full potential.
59. The campus also lies at the heart of the Oxfordshire Strategic Economic Plan to develop the Science Vale as a world class business location and forms a critical focus of the LPP1 strategy for the South East Vale to accommodate the majority of the District's employment and housing growth.
60. The SQW report argues that the innovation village is principally needed to realise the full potential of the campus by providing accommodation to secure an appropriate supply of skilled labour. There is no doubt that the continuing success of the campus relies on the recruitment and retention of highly skilled,

internationally mobile staff, and this has to be achieved in a buoyant labour and housing market. Surveys of campus organisations confirm the difficulty of recruiting staff and show support for the principle of on-site housing to assist, but there is no evidence to demonstrate that recruitment is significantly more difficult than for similar employers elsewhere in the Science Vale or that the ability to offer accommodation on site would solve the problem.

61. From the staff perspective surveys also show there is a shortage of suitably priced accommodation in the area, both to buy and to rent. However, there is no evidence that the problem is significantly worse for Harwell Campus based staff than those who work elsewhere in the Science Vale. Housing costs are a concern across Oxfordshire, but the SHMA considered the overall need for additional housing in this context, taking full account of projected employment growth and affordability data. The amount of housing to be provided in the District overall and in the Science Vale ring fence area reflects these findings and will result in a significant boost in supply locally, most notably at Didcot Garden Town and Wantage/Grove.
62. There may be a particular problem for scientific/research staff at the start of their careers and for those on short term contracts or visitors, but there is no reason why the campus could not assist by the acquisition of existing housing to provide short term rented accommodation in nearby settlements. Furthermore, outline planning permission was granted in 2016 for serviced and short stay accommodation for staff and visitors as part of a mixed-use scheme on campus which would address these needs. There is widespread support for the provision of some ancillary accommodation of this nature on campus, but this does not appear to have been progressed to date.
63. The SQW report also argues that the proposal would lead to an 'innovation district' to respond to the apparent cultural shift amongst highly educated, mainly younger adults for co-located living where ideas exchange and innovation can thrive. Four examples are given of innovation districts being developed in Oxford and Cambridge, but the information provided is limited and they appear to be essentially mixed-use neighbourhoods in existing successful university cities. It is not clear that a standalone, relatively isolated 'village' of just 1,000 dwellings at Harwell Campus would be comparable.
64. Policy CP15a states the innovation village will provide a tailored mix of dwellings to meet the needs of the campus but includes no policy to restrict occupation to campus staff, a fundamental requirement if the housing is to assist campus businesses and facilitate innovation on the site. Without such controls only about 10% of the residents of the nearby Chilton Field housing estate work at the campus. After the hearings the Council suggested such a policy restriction, but with 65% of the housing proposed for private sale or rent the legal mechanisms to ensure occupation by campus workers, not just initially but also subsequent occupiers, have not been adequately explained.
65. Whilst the provision of dedicated on-site accommodation would have benefits for campus organisations and staff, this does not amount to the exceptional circumstances necessary to justify the proposal in the AONB. In particular, there is no evidence that particular businesses have declined to locate or expand at the campus due to the absence of on-site housing, and there is no quantitative assessment of the local economic impact of the proposal in terms

of the additional employment or economic growth that it would generate. On the contrary, at least 15 ha of employment development has been permitted in the last five years demonstrating that the campus has been successful in attracting investment without an innovation village at the site, and there is no reason to suggest that this success will not continue.

66. The 37 ha housing site formed part of a strategic employment allocation in the 2011 Local Plan and continues to be reserved for such purposes by LPP1 Policy CP6. Most of the site also lies within the 93 ha enterprise zone designated in 2012 to deliver business development at the campus with long term financial incentives in place until 2037. The bid for enterprise zone status did not include the innovation village proposal. Whilst it is argued that use of part of the campus site for housing will support more effective employment use of the remainder, and the land still available for development is more than sufficient to accommodate the 5,400 additional jobs planned up to 2031, the fact is that the housing allocation would take up part of the campus which would not then be available for employment use in the longer term. This could lead to future pressure for expansion of the campus onto surrounding undeveloped AONB land. The proposal would also bring forward development of the open field to the south of the Icknield Way which, although allocated for employment use, is likely to remain open land within the AONB for some time.
67. In relation to the environment, landscape and recreational opportunities the campus forms a discreet 280+ ha site surrounded by the open, agricultural landscape of the North Wessex Downs. It offers an attractive, low density setting for a wide range of institutional and business uses, with many areas retaining a spacious, well treed parkland character. This character would be fundamentally changed by extensive housing areas however well designed and integrated into the campus although more intensive employment development would also affect the character of the site. Much of the proposed housing allocation is previously developed land and its boundaries are generally well screened by tree belts/hedgerows which could be enhanced to assimilate the housing into the wider landscape. Once these are fully established, in long distance views the housing would be relatively unobtrusive and seen in the context of the campus as a whole. However, in closer views, particularly from the Icknield Way which passes through the campus, the housing would have a substantial visual impact as it would be seen as an anomaly within the well-established research/business park environment. This would be detrimental to the enjoyment of this recreational route but only for a relatively short section of its overall length.
68. If the case for an innovation village associated with the campus were to be accepted, by definition the housing could not be accommodated elsewhere and there would be no scope for the development outside the AONB or meeting the need in some other way. However, at present the evidence is insufficient to justify the proposal. Whilst the important scientific, research, innovation and economic roles of the campus are fully recognised and supported, the LPP1 strategy is to ensure employment growth in the Science Vale – including that at the campus – is matched by additional housing provision in the Science Vale as a whole. CP5, the housing supply ring fence, is designed to deliver this objective and ensure sufficient housing is provided in nearby settlements to limit commuting distances and ensure a sustainable pattern of development overall. As paragraph 91 below explains, even without 1,000 dwellings at

Harwell Campus, the plan is sufficiently flexible to ensure the requirement for additional housing within the South East Vale – almost the same area as the Science Vale – is likely to be met over the plan period.

69. In conclusion, there are no proven exceptional circumstances nor can it be demonstrated to be in the public interest for major housing development to be allocated in the North Wessex Downs AONB at Harwell Campus. To be consistent with national policy **MM2**, **MM8**, **MM9** and **MM25** are therefore necessary to delete the proposal from the plan. Following on from this, it is also necessary for **MM9** to clarify the role of the comprehensive development framework for the site to make clear the framework is limited to the provision of ancillary serviced and short stay accommodation on the campus.

Issue 4 – Whether the other housing allocations in the plan are justified, effective and consistent with national policy

70. In order to meet identified housing needs, a series of other housing allocations are put forward at Kingston Bagpuize (in Fyfield and Tubney Parish), Marcham and East Hanney in the Abingdon and Oxford Fringe sub area and Grove in the South East Vale sub area. There is no requirement for any further allocations in the Western Vale sub area, those in the LPP1 being sufficient. The Council followed a comprehensive and robust five stage approach to site selection. This used appropriate criteria, took into account the spatial strategy for the district and settlement hierarchy established by the LPP1, included a detailed assessment of constraints and opportunities and subsequently rigorous testing of preferred sites.

Abingdon and Oxford Fringe Sub Area

71. In addition to the LPP1 allocations and Dalton Barracks allocation in the LPP2 which are best placed within the Abingdon and Oxford Fringe sub area to provide for the unmet needs of Oxford City, additional allocations are required in the sub area to provide for the district's housing needs. Policies CP4a and CP8a consequently identify further allocations for 600 dwellings at Kingston Bagpuize with Southmoor (in Fyfield and Tubney Parish), 90 dwellings at Marcham and two allocations for 80 and 50 dwellings at East Hanney. All three villages are classified as larger villages in Policy CP3 where new homes are to be focussed and all three settlements provide opportunities for further development in that part of the sub area which lies beyond the Green Belt.
72. Kingston Bagpuize with Southmoor comprises a linear village now by-passed by the A420 which has grown substantially in recent years and is currently further expanding to the east of the A415 following a 280 dwelling allocation in the LPP1. Although without a central focus, the village offers a variety of amenities for residents including a school, business park, recreation areas and shopping facilities. The 35 ha allocation for 600 dwellings would extend the village further east again, and comprises open agricultural land in the adjacent parish of Fyfield and Tubney. The housing area would have a walking/cycling route direct to the existing village but vehicle access would be from a new A415/A420 link road which would provide an alternative through route for the busy A415 which currently passes through the village centre.
73. Although within the Corallian Ridge landscape area and close to Kingston Bagpuize conservation area with the manor house and church, the site itself comprises relatively unremarkable farmland and is well screened by hedgerows on its boundaries. Development of the site would extend the form of the village and involve building towards Fyfield, an attractive historic settlement. However, except for a few houses, Fyfield lies on the other side of the A420 and the new link road would establish a long-term eastern boundary for Kingston Bagpuize with Southmoor, thus avoiding any risk of coalescence.
74. The allocation, whilst large in relation to the size and current facilities of the village, would deliver a new primary school/nursery, local centre, contributions to other facilities, public open space, affordable housing, an A415/A420 link, traffic relief and environmental improvements in the village centre. With frequent public transport services to Oxford and Swindon, the village is one of

the more sustainable locations within the sub area. Further housing would provide an opportunity to enhance village facilities and with careful planning there is no reason why it could not form an attractive place to live.

75. It is not expected that the development would cause significant additional congestion along the A420 but the additional traffic along the A415 to the east would increase current levels of congestion at the Frilford traffic light junction and air pollution through Marcham. The need to upgrade Frilford junction prior to the development of the site means house completions are unlikely before 2024/25 when the works are programmed. **MM28** is therefore necessary for effectiveness to amend the site development template to restrict the occupation of any dwellings until the upgrade is in place and, in the light of consultation responses, a similar restriction until there is satisfactory air quality mitigation for Marcham. For the same reason **MM28** also strengthens the requirement for measures to alleviate traffic flows through the village centre and to ensure the local centre serves village needs.
76. Marcham is a compact settlement straddling the A415 just to the west of the A34 and offers a range of services including a school, community centre with sports facilities, shop and regular public transport to Oxford and Wantage. The 3.6 ha allocation for 90 dwellings comprises agricultural land on the south east side of the village and lies next to Willow Farm, a recent housing development of 54 dwellings. Most importantly, the allocation lies between Willow Farm and the planned route of the Marcham southern by-pass and as such would form a natural extension to the village.
77. With funding for the by-pass not yet in place its timing is uncertain but the allocation allows for the route of the road along its south eastern side and this would then form a long term boundary for the village. Vehicular access to the site would be from the A415 with a pedestrian link also envisaged direct to Willow Farm. Most traffic from the development would route to and from the east; modelling demonstrates the remainder would only have a negligible impact on air quality in the narrow and twisting Packhorse Lane to the west which is the focus of the designated Marcham AQMA.
78. With no overriding objections to its development, the site provides a suitable opportunity for further expansion of the village in the short to medium term whilst reserving the route for the by-pass and providing affordable housing, open space and a landscaped edge to the settlement.
79. East Hanney straddles the A338 between the Frilford junction and Grove; it is closely associated with but regarded as separate from nearby West Hanney. Although the village offers a relatively limited range of services, these include a school, recreation ground, community hall/shop and regular public transport to Oxford and Wantage, the most important services and sufficient for East Hanney to qualify as a larger village in the LPP1 settlement hierarchy. Whilst the village has grown significantly in recent years some further housing would not be out of place and the extra residents would help support local facilities.
80. The 3.4 ha allocation for 80 dwellings to the north of the village comprises a grass field adjacent to the A338 with housing on two sides and a hedgerow providing some visual separation from the open countryside to the north. Whilst the houses backing onto the site along Ebbes Lane lie in the designated

conservation area, none are listed and there is no reason why a well-designed scheme on the site would not be in keeping with the character of the village. The site has no particular ecological or landscape value and is relatively unconstrained, albeit there are understandable local concerns regarding flooding as the village has suffered flood events in the recent past.

81. The site has been seen to flood on occasion and the northeast part of the site lies within flood risk Zone 2. However, the geology of the site may result in saturation of the topsoil during periods of heavy rainfall and the latter area would not be developed. Detailed technical reports debated at the hearings indicate that a hybrid drainage strategy with some infiltration and some on-site balancing is likely to successfully limit run-off to at most greenfield levels. Given there is a reasonable prospect that a suitable drainage strategy can be achieved at planning application stage the allocation is justified in the plan.
82. The 2.4 ha allocation for 50 dwellings north east of the village would lie to the east of Dandridge Close, a recent housing development, and north of another site recently granted planning permission. Whilst on the eastern side of the A338, away from the heart of the village, the village has expanded in this direction in recent years and the proposal, set back behind other housing, would neither be visually prominent nor encroach unduly into the surrounding countryside. Although this part of the village has developed in a piecemeal fashion pedestrian links through to adjacent sites are achievable and a pedestrian crossing over the A338 is under active consideration.

South East Vale Sub Area

83. Apart from the allocation at Harwell Campus dealt with under Issue 3, one further 28 ha allocation is made in the South East Vale for 400 dwellings to the north west of Grove. This large settlement, classified as a local service centre in the LPP1, lies just to the north of the market town of Wantage and offers a wide range of facilities and good public transport links including potentially a station on the Great Western Mainline. Together with Wantage, Grove is a focus of major housing development in the South East Vale and already has large scale housing allocations for 2,500 dwellings at Grove Airfield and 885 dwellings at Monks Farm, both now under construction.
84. The allocation north west of Grove in the LPP2 lies between these two existing allocations with the railway line forming the northern boundary. With no significant constraints the site forms a natural extension of the two existing allocations. Fundamental to the development of both Grove Airfield and Monks Farm is the Grove Northern Link Road which will link the sites to the A338 and provide a public transport route in due course. The new allocation will assist in the delivery of this road by linking the two other sites and adding further development value; it will also assist to deliver a more comprehensive development of the area with the opportunity for an integrated network of roads, cycleways and footpaths, strategic open space and potentially a new primary school. The site is large enough to deliver more dwellings after the end of the plan period but how many is unclear at this stage.
85. There are no significant objections to the allocation of this land, the concern in representations is that the site may not contribute housing completions during the plan period. However, given sufficient demand the site is likely to deliver

housing before 2031 and it merits allocation to facilitate comprehensive development in the area. To ensure effectiveness **MM10** is necessary to include a policy in the plan to guide development of the site and to provide for the preparation of a supplementary planning document for the area.

86. The site development templates in Appendix A set out the general and site specific requirements for the housing allocations in the plan following consultation with stakeholders. To ensure their effectiveness in delivering sustainable development, **MM24** requires a health impact assessment in each case and **MM26** requires an upgrade to the sewer network if this is necessary prior to the occupation of any dwellings.
87. In conclusion, subject to **MM10**, **MM24**, **MM26** and **MM28**, the other housing allocations in the plan at Kingston Bagpuize with Southmoor (in Fyfield and Tubney Parish), Marcham, East Hanney and Grove are justified, effective and consistent with national policy.

Issue 5 - Whether the overall provision of housing in the plan is adequate to meet the housing requirement for the district and the unmet needs of Oxford City and whether there would be a five-year supply of deliverable housing land on adoption of the plan

88. LPP1 Policy CP4 identified an extensive series of allocations to provide 12,495 dwellings towards the housing needs of the district, 1,790, 9,055 and 1,650 in the Abingdon and Oxford Fringe, South East Vale and Western Vale sub areas respectively. The policy also envisaged allocations for 1,000 dwellings in the LPP2, 722, 56 and 222 in each sub area respectively, but these totals were to be reduced if allocations were made in neighbourhood plans or came forward through the development management process. The requirement for a further 2,200 dwellings to meet the unmet needs of Oxford City would suggest that allocations for 3,200 dwellings should be made in the LPP2, the great majority of these, 2,922 dwellings, in the Abingdon and Oxford Fringe sub area.
89. However, since adoption of the LPP1 excellent progress has been made in relation to housing delivery in the district. Not only have completions risen to record levels, 1,615 and 1,620 in the two subsequent years, but planning permission has been granted on most of the allocated sites (or resolutions to grant permission subject to legal agreements), in some cases increasing the capacity of sites above that originally estimated. Together with a few new sites coming forward, the number of housing commitments increased from 4,468 to 13,387 dwellings in just two years. A modest increase in the windfall allowance from 70 to 100 dwellings per year is also justified on the evidence of such sites emerging since 2011.
90. As a result of all these unfolding changes, total housing provision increased by a healthy 2,071 dwellings between adoption of the LPP1 and March 2018. On a like for like basis this reduces the need for housing allocations in the LPP2 from 3,200 to 1,129 dwellings. However, even excluding the Harwell Campus site, the plan prudently allocates land for an additional 2,420 dwellings which increases the ability of the plan to deliver sufficient housing should unexpected difficulties arise in bringing forward some sites.
91. As modified, Policy CP4a demonstrates a potential housing supply of 25,359 dwellings in the district as a whole during the plan period compared to a requirement of 22,760, an excess of 2,599 dwellings or 11.4%. The equivalent figures in modified Policies CP8a, CP15a and CP20a for the Oxford and Abingdon Fringe, South East Vale and Western Vale sub areas respectively are an excess provision of 542 dwellings or 7.1%, 1,326 dwellings or 11.1% and 731 dwellings or 23%. This built in flexibility is however necessary in the interests of a sound plan to address concerns that certain large strategic sites may not come forward as currently anticipated.
92. On the basis of these percentages the risk to delivery is greatest in the Oxford and Abingdon Fringe sub area where there are large sites allocated in the LPP1 and at Dalton Barracks and Kingston Bagpuize with Southmoor in the LPP2. Of the LPP2 sites, the former relies on the release of the site by the Ministry of Defence and, as modified, both depend on an upgrade to the Frilford junction and satisfactory air quality mitigation for Marcham. However, the release of the Barracks/Airfield is firm government policy, the upgrade of Frilford junction is planned in 2024/25 and air quality mitigation is under investigation. The

assumed timing of completions on both sites allows for generous lead in times and thus a reasonable prospect of delivery in the necessary timescale, thus meeting the NPPF test. There are also a range of smaller sites in both plans to assist delivery. Finally but importantly, the additional housing requirement for Oxford City in the sub area is a working assumption rather than definitive and warrants some caution in allocating sites in the LPP2.

93. In relation to the five-year housing land supply position, in accordance with Policy CP5 this is assessed in relation to the Science Vale ring fence area and the 'rest of district', with the two calculations added together to give the district wide figure. The latest statement produced by the Council, updated to take account of the LPP2 (i.e. with the additional requirement for the needs of Oxford and the new allocations, with the Harwell Campus site deleted), shows a respectable 6.25 years supply for the district as a whole, 5.3 years for the Science Vale ring fence area and 7.6 years for the 'rest of district'. Whilst the situation is tight within the ring fence area, this is more than offset by the 'rest of district'. Although it is possible to critique the expected completions on certain sites the recent track record of the Council in delivering housing is strong and provides confidence the reported position is robust.
94. In relation to the housing land supply position in years 6-10 and beyond to the end of the plan period, a detailed representation involving an extensive study claims that six large sites allocated in the LPP1 and LPP2 are unlikely to deliver the necessary housing, leading to an increasing five-year housing land supply shortfall, particularly in the Science Vale ring fence area. However, this analysis applies the definition of 'deliverable' sites in the NPPF, whereas the requirement for the later years of the plan is to identify 'developable' sites in a suitable location where there is a reasonable prospect that the site is available and could be viably developed at the point envisaged.
95. The evidence is that the six sites are likely to be 'developable' in these terms during the later years of the plan period. The site East of Sutton Courtenay is subject to highway and flooding constraints but the evidence indicates that these can be overcome in due course. The latter stages of the Monks Farm and Grove Airfield sites depend on completion of Grove Northern Link Road which requires land acquisition and legal steps to cross a right of way, but there is no reason why these issues cannot be resolved at the appropriate time to allow housebuilding to continue. With sufficient demand and enough outlets at Grove the new allocation to the North West would also deliver within the plan period. Subject to satisfactory infrastructure provision there are no constraints which would restrict development at Valley Park Didcot if the demand is there. Finally, the Ministry of Defence is bringing forward development at Dalton Barracks/Abingdon Airfield prior to the release of the whole site and there is no reason that the delays experienced elsewhere will necessarily occur here. Overall, whilst there are challenges in delivering planned housebuilding on the LPP1 and LPP2 allocated sites there is sufficient flexibility built into the plan to allow for some slippage and thus no need to allocate any further sites in the LPP2.
96. Monitoring the effectiveness of the LPP2 in ensuring the planning strategy for the district is being delivered will be carried out under the provisions of Policy CP47a. This is equivalent to the very similar Policy CP47 in the LPP1 which, as modified, was found sound. Should development of allocated sites or the sub

area strategies not progress as envisaged, Policy CP47a obliges the Council to investigate the reasons and implement any appropriate action including the resolution of infrastructure issues, accelerating delivery on committed sites, identifying further sites or undertaking a partial or full review of the combined LPP1/LPP2 plan. There is also a legal requirement to review the plan after five years and in the case of Oxfordshire a commitment to prepare a Joint Spatial Strategy after which the Council plans to review both the LPP1 and LPP2.

97. For these reasons I conclude that the overall provision of housing in the plan is adequate to meet the housing requirement for the district and the unmet needs of Oxford City and there would be a five-year supply of deliverable housing land on adoption of the plan.

Issue 6 - Whether the proposals to safeguard land for future infrastructure schemes are justified

98. Policies CP12a and CP18a safeguard land for a series of strategic highway improvements, Policy CP14a for the Upper Thames Strategic Storage Reservoir and Policy CP19a for the re-opening of Grove Station. These policies are intended to prevent prejudicial development pending firm proposals rather than being definitive allocations for the purposes concerned. However, for safeguarding to be justified the schemes concerned must have a firm basis and a reasonable prospect of implementation in the medium term. The safeguarding of land does not prejudice the outcome of future detailed studies nor the necessary approval processes in each case.
99. Policy CP12a safeguards land for two potential Park and Ride sites to serve Oxford at Cumnor on the A420 and Lodge Hill on the A34. These proposals are included in the Local Transport Plan and the new Park and Ride strategy for an 'outer ring' of sites to intercept car trips before they reach the ring road and to act as interchanges for feeder services and rapid transit routes linking to Oxford city centre and other key employment areas. With congestion approaching Oxford from the south, land is also safeguarded for a northbound bus lane on the A34 between Lodge Hill and the Hinksey interchange.
100. The May 2016 'Oxford Park & Ride Future Strategy Development' report by Atkins selects the two sites from amongst the alternatives along the corridors concerned and includes feasibility design drawings from which the extent of the safeguarded site in each case is derived. The route safeguarded for the Lodge Hill to Hinksey bus lane is the only feasible one to serve the purpose concerned. There is thus sufficient evidence to justify safeguarding the land for these proposals in the LPP2. The A415 Marcham interchange is suggested by some as a preferable location to Lodge Hill for the A34 Park and Ride site but this would not be so effective in serving the Abingdon area as a whole nor so operationally efficient.
101. Policy CP12a also safeguards a pair of routes from the Barracks/Airfield site to the proposed Park and Ride site at Lodge Hill for public transport and cycle links to serve the new development. However, there is no evidence that public transport services would be viable along these routes even in the long term nor that the routes have emerged from the preparation of an overall cycling strategy for the development. These routes are not therefore justified. It is now proposed to upgrade the existing footpath and overbridge between Shippon and Abingdon to improve access towards Lodge Hill and this is a suitable alternative. **MM6** is thus necessary for the policy to be justified.
102. The narrow width and twisting alignment of the A415 through Marcham leads to poor air quality in parts of the village and the Frilford traffic light junction to the west causes congestion at peak times. Safeguarding the route for a by-pass linking to an improved junction at Frilford is therefore justified in Policy CP12a even though there is no funding currently identified for the scheme.
103. Policy CP18a safeguards an amended corridor for a Thames river crossing between Culham and Didcot and the route of a pedestrian/cycle bridge over the A34 at Milton Heights. An improved cycle route between Steventon and Milton to form part of the Science Vale Cycle Network has also been identified

recently and safeguarding this will facilitate sustainable transport choices in the area. To ensure effectiveness **MM11** incorporates this into the plan.

104. Policy CP18a also safeguards land for an improved access from the A34 to Milton Park. Milton Park is a strategic business location critical for planned employment growth in the Science Vale and the existing A34 junction suffers congestion at peak times. The principle of improved access to the A34 is fully justified and new north facing slip roads the most likely option although there are currently no detailed proposals. Any scheme would have environmental impacts and affect the setting of the Grade I listed Milton Manor but this would be taken into account at design stage. It is not clear if a currently proposed noise bund would be affected. As submitted the safeguarded land encroaches into the nearby golf course but following reassessment this is not necessary so **MM11** reduces the area involved to ensure the policy is justified.
105. LPP1 Policy CP14 safeguards land for strategic water storage reservoirs north of Longworth and between Drayton, East Hanney and Steventon if required following approval by the Department for Environment, Food and Rural Affairs of the Water Resources Management Plan 2019 (WRMP) currently being prepared by Thames Water. The Longworth option has now been ruled out but LPP2 Policy CP14a extends the safeguarded area for the other option from an indicative elliptical area out to the A338, A34, Childrey Brook/River Ock and the railway line, which comprise suitable physical boundaries.
106. Whilst there could be wildlife and recreational benefits, the reservoir, if built, would have major implications for the area. The visual impact of the structure on the landscape, removal of residents and businesses, loss of agricultural land, impact on heritage assets and disruption during the lengthy construction period would be substantial. The scheme would require a full Development Consent Order process and would only proceed to that stage if the need is established through the WRMP which may itself involve a public inquiry.
107. The wider area now safeguarded includes the land required for construction, maintenance and environmental mitigation, and is based on a concept design drawn up by Thames Water in 2007. A small area with planning permission adjacent to Steventon has been excluded. Safeguarding the extended area is justified to ensure the whole scheme could go ahead in a satisfactory manner including accommodation works and landscaping. To plan ahead to secure water supplies for the Thames Water region in the long term to 2100 is in the national interest and the need to safeguard land in these circumstances is recognised in the NPPF. However, to be justified, **MM7** is necessary to ensure that safeguarding ends should the scheme falter for any reason.
108. There is local agreement that reopening Grove Station on the Great Western Mainline would enhance sustainable travel options in the district. LPP1 CP19 established the principle of this and safeguards land immediately to the east of the A338 for the purpose. LPP2 Policy CP19a revisits the location of the proposed station by safeguarding two new options, the Bradfield site west of the A338 and land at Denchworth Road further west.
109. As the SLC Rail report explains, reopening the station is technically challenging with railway infrastructure constraints critical, but the preferred location is also affected by access and land use constraints. Williams Grand Prix Engineering,

an important hi-tech company, are situated directly opposite the Bradfield site, restricting platform and footbridge options there. A further possibility at Grove Park (South) to the east of the A338 has now been put forward, albeit linked to a housing scheme not included in the plan. Given the complexity of the project the options for the station should not be unnecessarily constrained. **MM12** therefore safeguards the additional option in order to maximise the effectiveness of Policy CP19a. A further site at Grove Wick Farm owned by Williams Grand Prix Engineering is also a possibility.

110. To ensure effectiveness, **MM6** and **MM12** also insert paragraphs into the plan to require the impact of these emerging schemes to be thoroughly assessed.
111. In conclusion, subject to **MM6**, **MM7**, **MM11** and **MM12**, the proposals to safeguard land for future infrastructure schemes are justified.

Issue 7 – Whether the development management policies in the plan are positively prepared, justified, effective and consistent with national policy

112. The LPP2 includes 39 development management policies which are designed to complement the district wide policies in the LPP1 and provide a comprehensive framework to guide development proposals.
113. Amongst the policies to build healthy and sustainable communities, Policy DP1 seeks to support self and custom build housing. However, as submitted, the policy would require such housing to be completed within three years which would be unenforceable and thus contrary to national policy. **MM14** removes this requirement and clarifies the policy in relation to major sites in the interests of effectiveness.
114. There is sufficient evidence to justify the requirement in Policy DP2 that one and two bedroom market homes and all affordable housing in the district should meet Level 1 of the Nationally Described Space Standards. In addition, there is evidence that the requirement would not make development unviable. However, to ensure effectiveness, **MM15** is necessary to clarify that this applies to both new build and conversion schemes.
115. Policy DP5 seeks to control replacement dwellings in the open countryside but **MM16** is necessary for effectiveness to clarify that the replacement should normally be on the same site. In addition, criterion ii goes further than necessary so **MM16** is also required to ensure the policy is consistent with national policy in the NPPF.
116. To ensure the effectiveness of Policy DP13e which seeks to protect retail uses in local shopping centres, **MM17** is necessary to add Grovelands at Grove to the list of centres covered. For the same reason **MM29** is required to add a new map (Appendix J) showing the local shopping centres that are to be retained and deleted compared to the saved policies in the Local Plan 2011.
117. Policy DP19 allocates land at Milton Interchange for the provision of roadside service facilities but this excludes the southern part of a larger site previously allocated for the purpose by saved Policy TR10 in the Local Plan 2011. Part of the southern site now forms part of the Milton Park Enterprise Zone and is covered by a local development order, but this does not in itself justify removal of the site from the previous allocation. **MM18** therefore reinstates the allocation on the site, but this does not preclude planning permission being granted for any other suitable uses that may come forward.
118. Policy DP29 aims to retain the physical and visual separation of settlements, but to be justified **MM19** introduces some flexibility into the wording. To be effective, **MM20** clarifies the requirement in paragraph 3.244 of the plan for buffer zones along the side of watercourses within development to be kept free of buildings.
119. Policies DP36, DP38 and DP39 relating to the protection of heritage assets, listed buildings and archaeology/scheduled monuments respectively require clarification and strengthening to be effective and to be consistent with national policy. **MM21**, **MM22** and **MM23** make the necessary changes.

120. In conclusion, subject to **MM14-MM23** and **MM29**, the development management policies in the plan are positively prepared, justified, effective and consistent with national policy.

Public Sector Equality Duty

121. During the course of the examination I have had due regard to the aims set out in Section 149(1) of the Equality Act 2010. This includes consideration of the plan's provision to meet the accommodation needs of gypsies and travellers and the need for accessible and adaptable housing.

Assessment of Legal Compliance

122. My examination of the legal compliance of the LPP2 is summarised below.

123. The LPP2 has been prepared in accordance with the Council's Local Development Scheme.

124. Consultation on the LPP2 and the MMs was carried out in compliance with the Council's Statement of Community Involvement.

125. Sustainability Appraisal has been carried out throughout the preparation of the LPP2, including an addendum at MM stage, and is adequate.

126. The Habitats Regulations Assessment incorporating Appropriate Assessment produced by Aecom in June 2018 concludes that the LPP2 will not lead to an adverse effect on the integrity of European sites either alone or in combination with other plans or projects. Likely significant effects are screened out for all sites except Cothill Fen SAC and Oxford Meadows SAC; for these appropriate assessments are carried out. In the case of Cothill Fen, housing development at the Barracks/Airfield site could lead to adverse impacts from recreational pressure but, as modified, at least 30 ha of parkland will be provided as alternative natural greenspace in mitigation. In relation to Oxford Meadows, housing across Oxfordshire generally, including that proposed in the LPP2, could result in a growth in traffic on adjacent roads and thus deterioration in air quality affecting a small part of the site. However, existing monitoring and mitigation measures for the site enable a conclusion of no adverse effect to be reached. An HRA statement was prepared at MM stage. Natural England have confirmed they are content with the conclusions of the HRA process.

127. The LPP2 includes policies designed to ensure that the development and use of land in the local planning authority's area contributes to the mitigation of, and adaptation to, climate change. These include policies to concentrate housing in larger settlements served by public transport, ensuring that housing to meet the needs of Oxford is located on sites near the City, Policies DP3 and DP7 to sub-divide and re-use existing buildings and Policy DP17 to encourage sustainable travel planning.

128. The LPP2 complies with all relevant legal requirements, including the 2004 Act (as amended) and the 2012 Regulations. In particular, the plan complies with Regulation 8 (4) & (5) in that the policies in the LPP2 are consistent with those in the adopted LPP1.

Overall Conclusion and Recommendation

129. The Plan has a number of deficiencies in respect of 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 2004 Act. These deficiencies have been explored in the main issues set out above.

130. However, the Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Vale of White Horse Local Plan Part Two satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

David Reed

INSPECTOR

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