

Cherwell District Council

Core Strategy DPD Consultation

Representations

Prepared on behalf of P3Eco and A2Dominion

April 2010

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CONTENTS

1.0 OVERVIEW1

2.0 THE NW BICESTER PROPOSALS AND POLICY CONTEXT2

3.0 THE ROLE OF NW BICESTER7

4.0 OTHER MATTERS.....9

1.0 OVERVIEW

- 1.1 Barton Willmore is instructed by P3Eco and A2Dominion. P3Eco successfully supported the promotion by the District Council of the identification of land to the north west of Bicester as an Eco Town, as defined in the supplement to PPS1 dated July 2009. P3Eco is an eco development facilitator. A2Dominion has been selected by P3Eco as its development partner for the promotion and implementation of the 'Exemplar' development, which will be the subject of an application for planning permission later this year. A2Dominion has also been selected to be P3Eco's housing association partner for the social/affordable housing element of the balance of the site. Land at NW Bicester is identified in emerging policy NWB1 of the Draft Core Strategy to provide for, inter alia, an eco development of 5,000 homes and jobs. The policy indicates that it expects 3,000 new homes and 3,000 new jobs along with the associated infrastructure will be provided by March 2026 and 3,200 by December 2026. In total, the Council estimates that that Eco Town will accommodate some 5000 dwellings.
- 1.2 P3Eco and A2Dominion support the principle of residential development on land to the northwest of Bicester. P3Eco's and A2Dominion's representations relate to the detailed drafting of the policy and elements of the general approach taken in the draft core strategy. In short, the representations will put forward the case on behalf of P3Eco and A2Dominion that:
- That the Core Strategy should set out more clearly the planning policy context within which the Eco Town will be brought forward.
 - The Core Strategy should address the relationship between the NW Bicester Eco Town designation and the flow of benefits and opportunities to the existing town which can be maximised by taking a joint strategic 'whole of Bicester' approach.
- 1.3 Both P3Eco and A2Dominion have worked extensively with the Council, Bicester Town and Oxfordshire County councils, the local community, the Government and other stakeholders in developing the proposals for NW Bicester and look forward to continuing to do so, both in formulating the master plan and planning applications but also in bringing forward the core strategy and related DPDs.

2.0 THE NW BICESTER PROPOSALS AND POLICY CONTEXT

- 2.1 The strategic planning policy context, to which the Core Strategy ought to respond, is set by the South East Plan (May 2009) (SEP). The SEP sets, amongst other matters, the strategic housing requirement for the District, being 13,400 dwellings in the period 2006 to 2026 (Policy H1), with an annual average build rate of 670 dwellings. The SEP requires that LPAs achieve at least the annualised average rate for the period 2006-2021 and make up any shortfall.
- 2.2 Policy CC1 Sustainable Development of the South East Plan seeks to achieve sustainable development by achieving sustainable levels of resource use; ensuring the physical and natural environment of the South East is conserved and enhanced; reducing greenhouse gas emissions associated with the region; ensuring that the South East is prepared for the inevitable impacts of climate change; and achieving safe, secure and socially inclusive communities across the region.
- 2.3 In July 2009, the Government published a supplement to PPS1 entitled 'Eco-Towns'. The PPS1 Supplement set out the policies of the Government in bringing forward 'Eco Towns' and identified four locations, including land at NW Bicester. The shortlisting of NW Bicester was supported by a range of studies and assessments undertaken on behalf the District Council
- 2.4 In response to the District Council's ambition for the NW Bicester designation, P3Eco assisted in the final application for designation. It was on the strength of P3Eco's proposals and involvement that the Council was able to secure the NW Bicester designation.
- 2.5 The designation of NW Bicester as promoted by the District Council and P3Eco's proposals can make an important contribution to not only securing sustainable patterns of development but also in meeting the Council's strategic housing and employment requirements.
- 2.6 P3Eco and A2Dominion are working closely with the District Council to be able to develop both Exemplar and Masterplan proposals for consideration which address the Council's identified needs.

- 2.7 The emerging Core Strategy should seek to set the broad policy framework for the Eco Town at NW Bicester, confirming the policy framework that the Council will seek to adopt to secure its timely implementation and confirm the contribution that the Eco Town will make to strategic housing and employment requirements.

The PPS1 Supplement

- 2.8 As stated, the PPS1 supplement sets out the criteria to which the development at NW Bicester is to respond (para 7). Importantly, the PPS1 Supplement confirms that it is for the District Council to decide whether it wishes to bring forward the Eco Town or whether it considers that the District's strategic housing and employment requirements can be better met by alternative forms of development.
- 2.9 The Council's ambition for the development of land as an Eco Town at NW Bicester has recently successfully secured [£9.7m] in Government funding to support the proposals.
- 2.10 The criteria set out in the Supplement address a range of matters including:
- Zero Carbon in Eco-Towns;
 - Climate Change Adaptation;
 - Homes;
 - Employment;
 - Transport;
 - Healthy Lifestyles;
 - Local Services;
 - Green Infrastructure;
 - Landscape and Historic Environment;
 - Biodiversity;
 - Water;
 - Flood Risk Management;
 - Waste;
 - Master Planning;
 - Transition; and
 - Community and Governance.

2.11 Any development of this scale will be phased. P3Eco and A2Dominion are working with the Council in formulating proposals for the Exemplar phase, the purpose of which will be to demonstrate how the aspirations of the Council and Government can be met. Discussions are continuing with the Council as to the precise form of the Exemplar. However, at present, it is likely that the Exemplar will provide for:

- Some 350 new dwellings,
- Local retail facilities;
- A care home;
- Provision for a new primary school;
- Community facilities.

2.12 In addition, P3Eco are formulating proposals for a new energy centre. It is intended that a planning application or applications will be submitted later this year.

Housing Land Supply – Government Guidance

2.13 South East Plan Policy H1 identifies a total requirement of at least 13,400 dwellings to be provided in the period 2006 - 2026. PPS12 requires LPAs to identify land for at least 15 years, with PPS3 requiring 5 years of specific deliverable sites that are available, suitable and achievable and to identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated (PPS3, para 55).

2.14 There is also a need for LPAs to set out a housing trajectory, identifying the components of supply over the above periods. The Local Development Framework Monitoring: A Good Practice Guide provides guidance in this respect stating that authorities should initially develop housing trajectories as part of the supporting evidence base underpinning either the Core Strategy or Site Allocation DPD (see para 4.24). Once established the trajectory should then be updated annually as part of the annual monitoring report.

2.15 The housing trajectory therefore forms part of the evidence base demonstrating the soundness of the Core Strategy's approach to housing land supply. In short the LPA must demonstrate that the proposed growth strategy will ensure both a 5 year housing land supply of deliverable sites and that sufficient land/sites are identified to meet the South East Plan housing requirements within the plan period.

- 2.16 Having regard to the above, for the first 5 year period the trajectory should set out the net additional dwellings to come forward each year from ready to develop sites identified as part of the plan's approach to housing. This should be supported by a site schedule that indicates the types of sites that have been included or excluded and a reasoned justification for the approach taken (this element is missing from the Draft Core Strategy). The schedule should also analyse whether each site is available, achievable and suitable. The remaining period of the 11 year trajectory (or extent of the plan period) should identify the net additional dwellings expected to come forward each year from developable sites and (where appropriate) broad locations identified as part of the plan's approach to housing.

Housing Land Supply - Council's Position

- 2.17 The Council's AMR sets out at Table 30 that (assuming the Council's own figures are robust, and that all sites identified are deliverable in accordance with the provisions of paragraph 54 of PPS3), the forecast supply will result in 8,263 new dwellings between 2006 and 2026. This results in a requirement for some 5,163 dwellings to be provided for by way of new allocations, including land at NW Bicester.
- 2.18 Notwithstanding the above figures in the Draft Core Strategy the Annual Monitoring Report 2009 (November 2009) correctly identifies the South East Plan requirements but that there is a projected shortfall of 5,820 dwellings (i.e. dwellings that need to be accommodated on allocated sites) which is an apparent discrepancy of 657 dwellings between the Housing Trajectory within the AMR and the Trajectory within the Core Strategy. It is of note that the AMR was produced in November 2009 and the Draft Core Strategy in February 2010 which could explain part of the discrepancy.
- 2.19 PPS3 requires a continuous 5 year rolling supply of deliverable housing sites to be maintained. It states that that a 'windfall' allowance (i.e. for unidentified sites) should not be included in the first 10 years of land supply unless there are genuine local circumstances that prevent specific sites being identified. Where it is not possible to identify specific sites for years 11-15 (of a 15 year land supply) in Local Development Frameworks, broad locations for future growth should be indicated.

- 2.20 The following table extracted from the Councils AMR 2009 provides a summary of the district's rolling supply of deliverable (available, suitable and achievable) housing sites over the periods 2009 to 2014 and 2010 to 2015 when measured against SEP requirements. It is clear that the period 2009 to 2014 identifies a 1 year shortage in deliverable sites and the period 2010 to 2015 has a 0.5 year shortage in deliverable sites. To confirm, the figures exclude developable sites and other housing potential.

		Five Year Period 2009-2014	Five Year Period 2010-2015
a)	South East Plan requirement	13,400 (2006-2026)	13,400 (2006-2026)
b)	Completions / projected completions	1734 (2006-2009)	1734+369=2103 (2006-2010)
c)	Remaining requirement (a-b)	11,666	11,297
d)	Annualised requirement over remainder of plan period (c/years)	686.2 (over 17 years)	706 (over 16 years)
e)	Annualised requirement over next 5 years (dx5)	3431	3530
f)	Supply from deliverable (available, suitable and achievable sites) over the next 5 years	2769	3200
g)	Total years supply over the next 5 years (f/d)	4.0	4.5

- 2.21 In short there is a need for clarity and consistency in presenting the housing land supply position to ensure that the Core Strategy's approach to housing growth will ensure a 5 year housing land supply of deliverable sites and that the South East Plan housing requirement will be met within the plan period.

3.0 THE ROLE OF NW BICESTER

3.1 Policy MON 1 of the Draft Core Strategy sets out that at least 500 new homes should be provided at North West Bicester Eco-Town by 31 March 2016, with the delivery of at least 1,750 new homes by 31 March 2021. In total, some 3200 dwellings are forecast for completion by 2026. Furthermore, the policy suggests that if this development is not forthcoming then land at South West Bicester could be released for a maximum of 750 new homes.

3.2 Current forecasts indicate the consideration of planning permission for the Exemplar scheme by late 2010, early 2011, with first occupations occurring later in 2011. Proposals for the wider scheme will be the subject of a planning application later this year. This application will set out the proposals for the scheme as a whole, and demonstrate how the criteria set out in the PPS1 Supplement will be met and 5000 new dwellings delivered.

The Policy Response

3.3 As stated, both P3Eco and A2D support the identification of land at NW Bicester in the emerging Core Strategy to provide for some 3200 dwellings in the period to 2026 as part of the development of an Eco Town. The Core Strategy should:

- Be at least consistent with the criteria set out in the PPS1 Supplement;
- Set out the policy mechanism and framework that the Council will adopt to deliver the project;
- Set out proposals to monitor delivery;
- Identify key infrastructure requirements for Bicester as a whole to provide context for consideration of the NW Bicester proposal.

3.4 At present, we do not consider that the emerging Core Strategy and policy NWB1 in particular achieve this. It should consider how the infrastructure requirements arising from the strategic requirements as set out in the SEP, individual developments and the needs of the population as a whole will be addressed: which forms of infrastructure should be development funded, which elements are scheme specific or serve a wider need.

- 3.5 We note the aspiration of the Council to achieve code level 6 and to exceed in many respects the criteria set out within the PPS1 supplement. P3Eco and A2Dominion are working with the Council to explore how the aspirations of the Council can be achieved over the life-span of the project.
- 3.6 The development of land at NW Bicester provides an opportunity to integrate with the existing settlement and the satisfaction of a number of Eco-Town criteria may well be best met by off-site schemes within the existing town such as transport strategy (modal shift) and access to employment.
- 3.7 In terms of planning policy process, the emerging Core Strategy should confirm whether the Council intends to bring forward an AAP or similar DPD or whether the Council will seek to provide further policy guidance by way of SPD.
- 3.8 Both P3Eco and A2D are grateful for the support of the Council and will continue to work with the Council and stakeholders in developing the proposals and in shaping the appropriate policy context.

4.0 OTHER MATTERS

- 4.1 In addition to the above housing related matters we have reviewed the content of the drafted policies. In this regard policy I4 (entitled 'Local Standards of Provision') sets out how development proposals should contribute to open space, sport and recreation and the play space standards that are required etc. We consider that this policy is in fact a Development Control policy and should be incorporated into that DPD rather than a Core Strategy policy.
- 4.2 PPS12 (Local Spatial Strategies) at section 4.1 sets out what a Core Strategy should include which is:
- (i) An overall vision which sets out how the area and the places within it should develop;
 - (ii) Strategic objectives for the area focussing on the key issues to be addressed;
 - (iii) A delivery strategy for achieving these objectives. This should set out how much development is intended to happen where, when, and by what means it will be delivered. Locations for strategic development should be indicated on a key diagram; and
 - (iv) Clear arrangements for managing and monitoring the delivery of the strategy.
- 4.3 Finally notwithstanding the draft wording of this policy there is a need to identify that eco settlements in accordance with the provisions of the PPS1 supplement are subject to their own open space requirements and therefore can not be subject to the wording in this policy. Therefore this reiterates the need for a clear policy line through an AAP or an SPD to be provided for.
- 4.4 Having considered the above criteria it is clear that a policy that sets out how much open space should be provided within a development does not fall within the tests and as such should be excluded from the Core Strategy.