



**Vale
of White Horse**

District Council

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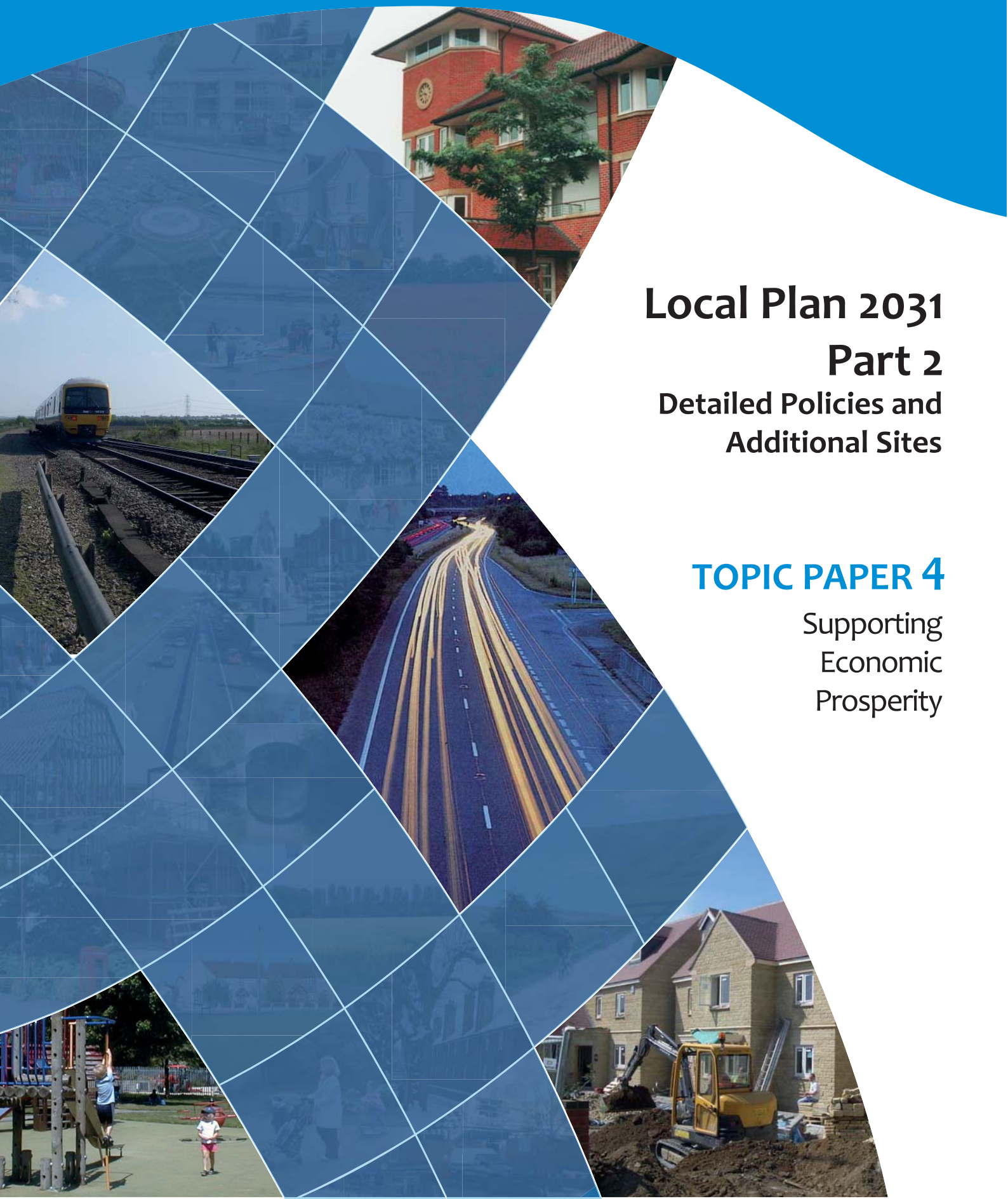
Local Plan 2031

Part 2

Detailed Policies and Additional Sites

TOPIC PAPER 4

Supporting
Economic
Prosperity



This paper is one of six topic papers, listed below, which form part of the evidence base in support of the Publication Version of the Vale of White Horse Local Plan 2031 Part 2.

These topic papers have been produced to present an overview of the evidence that has been considered in drafting the Local Plan 2031 Part 2. It is hoped that this will make it easier to understand how we have reached our conclusions.

The papers are available to view and access from the Council website:

www.whitehorsedc.gov.uk/LPP2

Topic Papers

1. Duty to cooperate
2. Site selection
3. Building Healthy and Sustainable Communities
4. Supporting Economic Prosperity
5. Supporting Sustainable Transport and Accessibility
6. Protecting the Environment and Responding to Climate Change

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1.0 INTRODUCTION

- 1.1 This topic paper sets out the process undertaken and evidence considered by the Council to inform the policies in Local Plan 2031 Part 2 (Part 2 plan) in relation to 'Supporting Economic Prosperity'.
- 1.2 The Local Plan 2031 Part 2 will sit alongside the Local Plan 2031 Part 1 (Part 1 plan) which was adopted in December 2016¹. The Part 1 plan sets the strategic priorities for the district to deliver sustainable development. It identifies the number of new homes and jobs to be provided in the area for the plan period up to 2031. It also identifies a number of district wide policies which provide strategic guidance on a number of topics.
- 1.3 The Part 2 plan complements the Part 1 plan by setting out:
- policies and locations for new housing to meet the Vale's proportion of Oxford's housing need, which cannot be met within the City boundaries, as agreed by the Oxfordshire Growth Board
 - policies for the part of Didcot Garden Town that lies within the Vale of White Horse District
 - detailed development management policies to complement the strategic policies set out in the Part 1 plan and replace the remaining saved policies of the Local Plan 2011, where appropriate, and
 - additional site allocations for housing.
- 1.4 This topic paper is one of a series that reflect the four thematic areas central to the Local Plan. These themes are as follows:
- Building Healthy and Sustainable Communities
 - Supporting Economic Prosperity
 - Supporting Sustainable Transport and Accessibility
 - Protecting the Environment and Responding to Climate Change
- 1.5 This topic paper explains how the Council has formulated its policies in relation to the Supporting Economic Prosperity theme. This includes employment, retail and the visitor economy.

¹ Vale of White Horse District Council (2016) Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies, available at: <http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/new-local-plan-2031-part-1-strategic-sites>

1.6 The structure of each topic paper reflects the following:

- **National Policy Context:** a brief summary of relevant national policies e.g. National Planning Policy Framework (NPPF), National Planning Practice Guidance (PPG) and relevant legislation.
- **Local Policy Context:** outlines relevant Core Policies in the Part 1 plan and provides a review and assessment of the relevant remaining saved policies in the Local Plan 2011.
- **Evidence:** summarises key evidence and its outcomes.
- **Sustainability Appraisal:** provides the conclusions of the Sustainability Appraisal of the Part 2 plan policies.
- **Summary of Consultation:** summarises key issues identified through each stage of consultation, including informal engagement with specialist officers and key stakeholders and Regulation 18 public consultation in March 2017.
- **Key Issues:** summarises the key issues considered when formulating the Part 2 plan policies reflecting national and local policies, evidence and consultation outcomes.
- **Conclusions:** provides the conclusions that have been reached in informing the Preferred Options and the Publication Versions plans.

2.0 EMPLOYMENT

- 2.1 This section summarises the process the Council has followed to formulate its policies in relation to the employment topic.

National Policy Context

National Planning Policy Framework (NPPF)

- 2.2 The National Planning Policy Framework (NPPF), states that the planning system plays an economic role in *contributing to building a strong, responsive and competitive economy*. One of the core land-use planning principles, is that planning should *'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'*.²
- 2.3 The NPPF is clear that Local Planning Authorities should have a good understanding of business needs in their area through working closely with a range of stakeholders.³ They should use their evidence base to assess the needs for employment land and floorspace and assess the existing supply of land.⁴
- 2.4 The NPPF, Section 1 sets out the Government's planning policies on 'building a strong and competitive economy'. It states that in drawing up local plans, Local Planning Authorities should:
- set out a clear economic vision and strategy for their area
 - set criteria, or identify strategic sites, for local and inward investment
 - support existing business sectors
 - identify and plan for new or emerging sectors likely to locate in their area
 - be flexible to accommodate needs not anticipated in the plan
 - plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries
 - identify priority areas for economic regeneration, infrastructure provision and environmental enhancement, and
 - facilitate flexible working practices.⁵
- 2.5 The NPPF highlights the need to make it easier for jobs to be created locally within cities, towns and villages. In addition to making provision for land and providing housing, infrastructure and favourable conditions to enable economic growth, it is also appropriate for Local Planning Authorities to consider how new jobs can benefit local communities.⁶

² CLG (2012) The National Planning Policy Framework (NPPF), paragraph 7

³ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 160

⁴ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 161

⁵ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 21

⁶ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 9

- 2.6 The NPPF also highlights the need to support a prosperous rural economy. It indicates that to promote a strong rural economy, local and neighbourhood plans should: support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings; promote the development and diversification of agricultural and other land-based businesses; and support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors.⁷

Planning Practice Guidance (PPG)

- 2.7 The PPG provides additional guidance on assessing economic development needs and uses. The guidance states that, when looking at what type of employment land is needed, the increasing diversity of employment generating uses requires different policy responses and an appropriate variety of employment sites. It is also clear that the need for rural employment should not be overlooked.
- 2.8 In looking at who Local Planning Authorities need to work with to robustly identify the need, the PPG states that they should work with other local authorities in their functional economic market area in line with the 'duty-to-cooperate'.⁸ In addition, it suggests that Local Planning Authorities also need to work with local communities, partner organisations, Local Enterprise Partnerships, businesses and business representative organisations, parish and town councils and designated neighbourhood forums.

Permitted Development Rights

- 2.9 The Government has introduced a range of new permitted development rights that allow for greater flexibility of change of use. A number of these rights impact upon economic development uses, retail and other main town centre uses. A1 uses (shops) can change to A2 uses (financial and professional services) without the need for planning permission, for example. The latest of these changes came into force on 23 May 2017⁹.
- 2.10 In Spring 2013, Government introduced a permitted development right that allows change of use from B1(a) offices to C3 residential¹⁰, with the new right initially applying for a three year period. Local Planning Authorities have been given an opportunity to seek an exemption to the new rights where this can be justified on economic grounds. There may also be further changes to national policy in relation to this issue. The district was granted exemption of permitted

⁷ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 28

⁸ CLG (2014) Planning Practice Guidance, Paragraph: 008 Reference ID: 9-008-20140306

⁹ The Town and Country Planning (General Permitted Development) (England) (Amendment) (No.2) Order 2017, available at: <http://www.legislation.gov.uk/uksi/2017/391/made/data.pdf>

¹⁰ On 6 April 2016, Government made permanent the permitted development right to change from office use to residential use. Further information can be found at: The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016, available at: <http://www.legislation.gov.uk/uksi/2016/332/contents/made>

development rights for Harwell Campus and Milton Park strategic employment sites.

Local Policy Context

Local Plan 2031 Part 1: Strategic Sites and Policies (Part 1 plan), Adopted December 2016

- 2.11 The Local Plan 2031 Part 1 identifies the employment needs for the district, allocates sufficient land to meet these needs and includes strategic employment policies. Strategic Objectives 5-6 of the Local Plan identify the key objectives for employment. This includes the aim of supporting a strong and sustainable economy and supporting the continued development of Science Vale as an internationally significant centre for innovation and science based research.
- 2.12 The Part 1 plan sets out a number of strategic policies relating to employment and includes:
- **Core Policy 6: Meeting Business and Employment Needs** identifies the employment needs for the district and allocates sufficient land to meet these needs
 - **Core Policy 8, 15 and 20: Spatial Strategies for the Abingdon-on-Thames and Oxford Fringe, South East Vale, and Western Vale Sub Areas** policies identify the strategic employment sites that are to be safeguarded in the respective sub-areas
 - **Core Policy 16: Didcot A Power Station** safeguards land at this site for employment development as part of a wider mixed use scheme;
 - **Core Policy 28: New Employment Development on Unallocated Sites** sets the Council's approach to assessing proposals for new employment on sites not already allocated, including in rural areas, and
 - **Core Policy 29: Change of use of Existing Employment Land and Premises** sets the Council's approach to assessing proposals for change of use of and loss of existing strategic employment sites and any other land and premises where the existing use is primarily employment related (B-use class).
- 2.13 The Part 1 plan states that Saved Policy E13 of the Local Plan 2011 related to ancillary uses, will need to be reviewed through the Part 2 plan process, and that further detail may be required in an additional policy in the Part 2 plan.¹¹

Saved Policies in Local Plan 2011

- 2.14 The Vale of White Horse Local Plan 2011 (LP2011) was adopted in July 2006. The majority of policies in the LP2011 were 'saved' by the Secretary of State in

¹¹ Vale of White Horse District Council (2016) Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies, Paragraph 6.39, available at: <http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/new-local-plan-2031-part-1-strategic-sites>

2009. Following the adoption of the Part 1 plan, a number of saved LP2011 policies were replaced however some policies continued to be saved through the Part 1 plan and will be replaced by the Part 2 plan.

2.15 The saved policies relating to employment that have been reviewed as part of preparing the Part 2 plan are:

- E1 Abingdon (specific allocations to be saved as identified in Core Policy 6; other allocations will not be saved)
- E2 Botley Area (specific allocations to be saved as identified in the Core Policy 6; other allocations will not be saved)
- E3 Faringdon (specific allocations to be saved as identified in Core Policy 6; other allocations will not be saved)
- E4 Grove Technology Park
- E5 Milton Park
- E6 West of Didcot Power Station
- E7 Harwell Science and Innovation Campus
- E8 Local Rural Sites
- E11 Rural Multi-User Sites
- E12 Large Campus Style Sites
- E13 Ancillary uses on key employment sites
- E15 Steventon Storage Facility (former Home Office Stores Site, Steventon)
- E16 New buildings required for agricultural purposes
- E18 Farm shops
- E19 Farm shops
- E20 The keeping, rearing and training of horses
- E21 Loss of facilities for the keeping, rearing and training of horses

2.16 An assessment of these saved policies has been undertaken to consider if these policies remain appropriate and consistent with national policy and guidance and if they should be replaced or updated by new policies within the Part 2 plan.

Appendix 1 shows the outcome of this assessment.

2.17 It is considered that there is no requirement to take forward saved policies E1 to E4 of the Local Plan 2011 as this level of detail is sufficiently covered within Core Policy 6 (Meeting Business and Employment Needs) of the Part 1 plan. Site specific requirements are also sufficiently covered by other relevant policies in the Part 1 plan. Saved policies E8, E11 and E13 of the Local Plan 2011 are not considered to be appropriate for replacement in the Part 2 plan as the detail of these policies is sufficiently covered by Core Policy 28 (New Employment Development on Unallocated Sites) in the Part 1 plan.

2.18 It is considered that saved policies E18, E19, E20 and E21 in the Local Plan 2011 are useful policies, but require updating to take account of supporting sustainable growth and expansion of business and enterprise in rural areas in line with the national policy and guidance. These policies will be updated in the Part 2 plan and combined into a singular policy related to rural diversification and

equestrian developments. More information is in the conclusion section of this topic.

- 2.19 It is not considered necessary to replace saved policy E15 of the Local Plan 2011 as this policy is considered to be inconsistent with the NPPF, as the policy currently restricts alternative uses being considered, even where there is no reasonable prospect of the site being used for the allocated employment use.

Evidence

- 2.20 To support the preparation of up to date Development Management Policies in the Part 2 plan that support economic prosperity, evidence has been drawn from a range of sources. Set out below is a short summary of each document that helped to shape the plan.

Vale of White Horse Employment Land Review 2013 Update, 2013 (including Addendum 2014)

- 2.21 The addendum¹² provides greater clarity on the jobs target of 23,000 for the district. It presents a comprehensive assessment and identifies the amount of land that is required to be designated to enable the jobs target to be met. The report identifies, with some exceptions set out below, that all employment land identified in saved policies E1 to E13 of the LP2011 should be carried forward and safeguarded for employment uses in the Local Plan 2031. This will help to ensure that there is adequate employment land to meet the needs of different types of economic activity over the plan period, as required by the NPPF.
- 2.22 The Part 1 plan identified sites to provide for a total of 218ha of employment land to meet the strategic employment need for the district up to 2031. Core Policy 6 (Meeting Business and Employment Needs) safeguards land for future employment development between 2011 and 2031. This land is provided by a combination of different sites including the provision of employment land as part of mixed use urban extensions at Monks Farm, Grove and South of Park Road, Faringdon; sites covered by the adopted Milton Park Local Development Order and vacant and developable land retained from saved Local Plan 2011 allocations for employment land.¹³
- 2.23 In addition to supporting appropriate new employment development, Core Policy 29 (Change of Use of Existing Employment Land and Premises) in the Part 1 plan also protects important existing employment sites in the Vale, to help ensure employment provision is increased over the plan period. These employment sites are also safeguarded and are identified in the Sub-Area Strategies; Core Policy 8 (Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area; Core Policy 15 (Spatial Strategy for South East Vale Sub-Area)

¹² URS (2014) Vale of White Horse Employment Land Review Addendum

¹³ Vale of White Horse District Council (2016) Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies, Paragraph 4.24, available at: <http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/new-local-plan-2031-part-1-strategic-sites>

and Core Policy 20 (Spatial Strategy for Western Vale Sub-Area). The Part 1 plan allocates sufficient land to deliver the districts employment land requirements and therefore the Part 2 plan does not propose to allocate further sites.

Vale of White Horse District SME Business and Innovation Strategy 2017

- 2.24. The SME Business and Innovation Strategy (2017)¹⁴ sets out how the Council will support businesses in the district. This follows a widespread survey of small and medium sized businesses which asked businesses about their needs and growth aspirations. The Strategy is based on four themes, including skills and labour force and infrastructure and planning. The Council will make businesses aware of opportunities to grow and facilitate ways to address skills gaps in key sectors.

Vale of White Horse District Business and Innovation Strategy Action Plan 2017-2020

- 2.25 The SME Business and Innovation Strategy Action Plan (2017)¹⁵ accompanies the Business and Innovation Strategy. The document provides an understanding of the needs of the SME business sector in Vale of White Horse and then recommends a series of actions and practical steps to maximise impact and benefits of business support interventions. The Strategy identified a number of key issues and challenges including the need to support businesses that may be struggling to attract and retain staff, particularly younger people, and to facilitate ways to address skills gaps within key sectors. The Council will seek to achieve this through the promotion of apprenticeships and career opportunities in SMEs.

Oxfordshire Strategic Economic Plan 2016

- 2.26 Oxfordshire Local Enterprise Partnership (OxLEP) has updated the Oxfordshire Strategic Economic Plan (SEP) to take account of the pace of economic change and new evidence that has emerged over recent years. The SEP is focussed on four priorities relating to 'People, Place, Enterprise and Connectivity.' The SEP identifies challenging issues with regard to social inclusion and there is also an identified need for excellent and creative responses to help more disadvantaged Oxfordshire residents to move into the labour market.

Oxfordshire Growth Board: Community Employment Plans Evidence Paper (emerging)

- 2.27 Community Employment Plans (CEPs) can play an important role in providing jobs and training for the local community and offer the opportunity to generate and share in increased economic prosperity. The work to implement CEP's into planning policy has been promoted by the Oxfordshire Local Enterprise

¹⁴ Vale of White Horse District Council and South Oxfordshire District Council (2017) SME Business and Innovation Strategy, available at: <http://www.vale4business.com/bis-action-plan/>

¹⁵ Vale of White Horse District Council (2017) Vale 4 Business: Business and Innovation Strategy Action Plan 2017 to 2020, available at: <http://www.vale4business.com/wp-content/uploads/2013/10/V4B-BIS-Action-Plan-web-version.pdf>

Partnership (OxLEP) through the Oxfordshire Growth Board, Oxfordshire Skills Board and the OxLEP Board. The Oxfordshire Growth Board resolved to endorse the CEP Evidence Paper¹⁶ and for OxLEP to continue its work with each Local Planning Authority.

- 2.28 The Oxfordshire Skills Board and Oxfordshire LEP are keen to maximise the opportunity for the creation of new jobs to benefit the local community through development proposals. Drawing on local evidence, the Evidence Paper highlights the need to consider mitigating impacts associated with development and to recognise the economic benefits that new development can contribute towards improving local skills and employment outcomes.
- 2.29 The report suggests that initiatives, such as Community Employment Plans, can help to tackle social deprivation, which currently exists in Oxfordshire and create more employment opportunities for local communities. This will assist in delivering a number of actions addressed in the Strategic Economic Plan including the alignment of skills provision with the jobs created, that a skilled local labour force is secured for the benefit of all parties and to address exclusion from the labour market.
- 2.30 The CEP Evidence Paper highlights that the district has a population of 120,988 and a strong knowledge-based economy. Levels of unemployment are relatively low and 47.7 % of the workforce is qualified to NVQ Level 4 or above. Employment is predominantly in the professional, scientific, and technical category (17.4%), followed by education (10.8%). This reflects the nature of the Science Vale area.
- 2.31 Some parts of Abingdon Caldecott are within the 20% most deprived areas nationally, although there are relatively low levels of deprivation across the district.

Vale of White Horse Local Plan Viability Update (2017)

- 2.32 The Council commissioned HDH Planning and Development Ltd to undertake a viability assessment¹⁷ of the Part 2 plan. Viability assessment tests the effectiveness of the cumulative impact of the policies in the Part 2 plan and whether they would put a development at risk.
- 2.33 The Viability Update and Statement have assessed the viability of the housing policies and conclude that the employment development management policies do not add additional burdens to developers.

Vale of White Horse District Council Corporate Plan 2016-2020

¹⁶ Oxfordshire Growth Board (2017) Agenda Item 8: Community Employment Plans; available at: <http://mycouncil.oxford.gov.uk/ieListDocuments.aspx?CId=460&MId=4690&Ver=4>

¹⁷ HDH Planning and Development Ltd. (2017) Local Plan 2031 Part 2: Viability Update and Statement:

- 2.34 The Vale of White Horse District Council Corporate plan 2016-2020¹⁸ sets out how the Council will create the right conditions for economic growth, so that businesses, residents and workers can prosper. The Council will, amongst other things, seek to maximise growth and inward investment and create high value jobs for residents. The Council will ensure the skills of employers in the district are identified and that training programmes are in place to provide a skilled labour force.
- 2.35 To achieve this, the Council will optimise employment opportunities by ensuring that the skills needs of our employers are identified and that training programmes are in place to provide a skilled labour force and work with developers to introduce local apprenticeship and local workforce schemes that benefit our residents. Community Employment Plans are a key way to deliver this.

Sustainability Appraisal

- 2.36 Sustainability Appraisal (SA) was undertaken on all of the Development Management Policies and the conclusions relating to policies that support economic prosperity are set out below. An SA Report should identify, describe and evaluate the likely significant effects of implementing the plan and reasonable alternatives. An interim SA report was published alongside the 'Preferred Options' version of the Local Plan 2031 Part 2 document for public consultation in March 2017 and final SA Report is published alongside the Publication Version of the plan.
- 2.37 The employment policies perform well, and should appropriately complement the Core Policies, as set out in the Part 2 plan. The final SA report concludes that the 'Publication Version' of the Part 2 plan is predicted to result in significant positive effects in relation to the economy objectives.

Summary of Consultation

- 2.38 The Council has undertaken both formal consultation and informal engagement, which has shaped the policies. Below is a summary of the consultation and engagement that has supported the preparation of the policies.

Informal Engagement

- 2.39 The Council undertook informal engagement with officers within the Council, including the Economic Development team, in November 2016 to inform preparation of the Part 2 plan. The responses received have identified a number

¹⁸ Vale of White Horse District Council (2016) Corporate Plan; available at: <http://www.whitehorsedc.gov.uk/about-us/how-we-work/corporate-plan>

of issues that helped inform policy development to inform the Part 2 plan Preferred Options Consultation. Key comments included:

- The Council's Economic Development Team were supportive of hotels and conference facilities as an ancillary use on employment sites
- the Council's Development Management Team commented that the detail covering existing saved policies E18 and E19 related to farm shops and E20 and E21 related to keeping, rearing and training of horses could be merged
- the Development Management Team commented that Saved Policy E13 of the Local Plan 2011 is effective and frequently used to inform decision making
- the Development Management Team commented that there has been limited activity at Steventon Storage Facility (saved policy E15) in recent years and the policy has rarely been used
- the Development Management Team suggested that some of the area specific policies are too restrictive
- the Development Management Team considered that the policy for Harwell Campus continues to have its benefits, including minimising the impact on the AONB, and
- the Economic Development Team raised some concerns regarding continuing with the Saved Policies regarding specific uses at specific sites.

2.40 The Council undertook a further stage of informal engagement with Oxfordshire LEP, Development Management and Economic Development Officers within the Council in July 2017 following the Preferred Options consultation. The responses received have helped to further refine the policies for inclusion in the Publication Version of the Part 2 plan. Key comments were as follows:

- Oxfordshire LEP suggested that the policy on CEPs should be refined to provide further clarity for decision makers, developers and those stakeholders who will support the implementation of CEPs
- Oxfordshire LEP also commented that the Council may choose to apply a threshold for development proposals that would require a CEP and suggested that their paper to the Oxfordshire Growth Board may provide the justification, and
- Oxfordshire LEP also commented that the supporting text should be refined to explain what a CEP is and provide context on the local labour market and the impact on deliverability and viability of sites, in light of skills shortages and potential increased labour costs.

Draft Local Plan 2031 Part 2: Preferred Options Consultation (March 2017)

- 2.41 The Council published the Preferred Options version of the Local Plan 2031 Part 2 in March 2017 for public consultation. A number of comments were received in relation to the employment policies. These comments identified a number of key issues that have helped to refine the policies for inclusion in the 'Publication Version' of the Local Plan 2031 Part 2. Key comments are summarised in **Table 1** below. All comments received from public consultation on the Preferred Options Version of the Part 2 plan, are summarised and available to view in **Appendix 3** of the **Consultation Statement**.

Table 1: Summary of consultation responses related to employment

Policy	Summary	Council response
Development Policy 9: Ancillary Uses on Employment Land	<p>Several comments suggested that the permission of ancillary uses on employment sites could result in the loss of employment use, or obviate the regeneration of town/village centres.</p> <p>Several comments suggested that Local Development Orders (LDOs) should not be used for other uses on employment land and that warehousing and distribution uses should be restricted to avoid pressure on existing infrastructure.</p>	<p>The policy seeks to ensure the vitality and viability of existing employment sites and businesses through the provision of appropriate additional services and facilities. The policy states that any non-B-use class proposals must not undermine the main business or employment function of the site. Many ancillary uses generate their own forms of employment, albeit not strictly under the B-use class.</p> <p>The use of LDOs have been effective in planning for economic success at major employment sites, such as Milton Park. LDOs can ensure ancillary uses support the continued success of employment sites by providing workers with key services and facilities, or providing convenient locations for other uses. They can also restrict the extent of non B-use class uses to ensure the main employment function is retained.</p>
Development Policy 10: Community Employment Plans	<p>Several comments state that there is insufficient local employment opportunities, which gives rise to more commuters and congestion. One comment questioned whether community employment plans (CEP) work and asked what it is they do.</p>	<p>The purpose of CEPs is to encourage local employment opportunities and resources which would reduce the need for in-commuting and reduce congestion on the district's road network. CEPs have proven successful tools in Oxfordshire, as demonstrated in the OxLEPs evidence on this point, cited earlier in the topic paper.</p>

	<p>Oxfordshire Local Enterprise Partnership supported the principle of a policy to deliver CEPs, but commented that the policy should include additional detail to reflect the LEPs available evidence. A threshold was also suggested for development proposals that would require a CEP. A few other comments sought the need for Community Employment Plans (CEPs)/Local Sourcing Plans (LSPs) to be made mandatory.</p>	<p>The council notes the support and continues to work proactively with OxLEP to plan successfully for the district. In doing so, further detail was added to the CEP policy after careful consideration of the recently published report on CEPs from OxLEP and their Preferred Options Consultation comments. The council also carefully considered the merit in making CEPs/LSPs a requirement for large scale development where significant employment is likely to be generated. However, requirements should be balanced against the evidence available and a more flexible approach was taken in the publication version of the policy. A CEP remains an option for all other developments.</p>
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Key Issues

2.42 The following key issues were identified and considered when preparing policies for inclusion in the 'Preferred Options' version for the Part 2 plan:

- the need for further policies on employment sites to complement policies in the Part 1 plan
- the need to consider a policy to support and develop opportunities for local employment arising from new development proposals
- national policy and guidance is relatively silent with respect to ancillary uses on employment sites, although a flexible approach is broadly encouraged
- current local policy and key stakeholders involved in the informal consultation are supportive of providing a more detailed policy on ancillary uses
- the nature of the district and national policy requirements reflect a need for a policy on supporting a prosperous rural economy in the district. This includes the provision of farm shops and additionally there is a need to support the keeping, rearing and breeding of horses in the district both on a commercial and private basis, and
- that limited development has taken place at Steventon Storage Facility and the current Saved Policy appears inconsistent with the NPPF.

2.43 The key issues as part of the process of refining the proposed employment policies for inclusion in the 'Publication Version' of the Part 2 plan, were:

- the need to consider making Community Employment Plans (CEP) a requirement for major development proposals, especially where significant employment is likely to be generated. It should still remain an option for all other developments
- the need to consider applying a threshold for when development proposals will be required to deliver a CEP, which could align with the evidence published by the Oxfordshire Local Enterprise Partnership, and
- the need to consider providing clarity in the supporting text and/or policy that development proposals involving other ancillary uses on employment land can also be granted, where appropriate, through a Local Development Order (LDO).

Conclusions

2.44 Set out below are the conclusions that the council reached to inform the preparation of the Part 2 plan. These conclusions were reached following consideration of the key issues that were identified from the emerging evidence base, and from the informal engagement and formal stages of consultation.

2.45 The conclusions in relation to the employment policies, for consideration in the Preferred Options for the Part 2 plan were as follows:

- The policy relating to the Steventon Storage Facility is not taken forward because it is considered to not be consistent with the NPPF as the policy currently restricts alternative uses being considered, even where there is no reasonable prospect of the site being used for the allocated employment use. The Development Management Team rarely apply the policy.
- a policy was included in relation to ancillary uses to provide further direction on where none B-use class development would be appropriate. The policy needed to provide flexibility to permit uses that are compliant with any adopted Local Development Order and Supplementary Planning Document. The council included a policy on ancillary uses on employment land, which supported the provision of ancillary uses to help make employment sites more attractive to incoming firms. Specifically, it set out criteria to establish where ancillary uses would be appropriate on employment land. National policy is relatively silent on this, however, Paragraph 22 of the NPPF provides some flexibility. Core Policy 29 sets out strategic policy for change of use of existing employment land and premises. The policy in the Part 2 plan adds further detail to state where small scale proposals for none B uses would be acceptable.
- a policy was included to clearly support a prosperous rural economy and to encourage the economic growth of different types of rural businesses. The policy also incorporated specific criteria in relation to proposals for new equestrian developments. The proposed policy guides and supports equestrian development, where this would be ancillary to the main use of the site, or relates to the existing enterprise. The policy also supported farm shops where they do not undermine the viability and vitality of shopping provision in nearby villages, and set out criteria for where the keeping, rearing, training and livery of horses will be permitted. Paragraph 28 of the NPPF states that policies should support economic growth in rural areas in order to create jobs and prosperity. Core Policy 28 establishes criteria for where new employment development on unallocated sites would be acceptable, including those in rural parts of the district, and the policy in the Part 2 plan added further detail.
- a policy was included in relation to supporting development proposals that create opportunities for local employment and the development of local skills and expertise. In consultation with OxLEP, the council included a policy that suggested all new developments should promote local employment opportunities in order to contribute to sustainable development. Paragraph 21 of the NPPF states that planning policies should recognise and seek to address potential barriers to investment and local planning authorities should set out a clear economic vision and strategy for their area, which positively and proactively encourages sustainable economic growth. To meet these aims, the Part 2 Policy set out when a Community Employment Plan (CEP) or Local Sourcing Plan

(LSP) would be required by the council. The policy also set out criteria for what a CEP – when prepared - should cover. It stated that they should provide details of project management, identify the areas of local employment need and opportunities to address them and provide a community consultation strategy.

- Saved Policies related to specific sites, including E1, E2, E3 and E4 were considered and not taken forward, as part of these policies are already sufficiently covered by Core Policy 6 and the site specific requirements are also covered by other relevant Part 1 plan policies
- policies related to local rural sites, rural multi-user sites and large campus style sites were considered and not taken forward in the Part 2 plan as Core Policy 29 in the Part 1 plan provides a sufficient level of detail to determine this type of proposal, and
- a policy to support proposals for new agricultural development was considered and not taken forward in the Part 2 plan as this is sufficiently covered through existing permitted development rights or, where full permission is required, criteria set out in Core Policy 28 of the Local Plan 2031 Part 1.

2.46 The conclusions in relation to the employment policies for consideration in the Publication Version of the Part 2 plan were as follows:

- the accompanying text to Development Policy 9 (Ancillary Uses of Employment Land) needed to provide further clarity that development proposals involving ancillary uses on employment land will also need to be in accordance with Core Policy 29 (Change of Use of Existing Employment Land and Premises) of the Part 1 plan. In the Publication Version of the Part 2 plan the council also included a paragraph of supporting text to clarify the point highlighted above and link to the Part 1 plan.
- Development Policy 9 (Ancillary Uses on Employment Land) and accompanying supporting text needed to provide further clarity that proposals for ancillary uses on employment land can also be granted where acceptable through a Local Development Order (LDO) or a Supplementary Planning Document (SPD). This requirement was already contained within the criteria of the policy. For the Publication Version, the council amended the policy and included this requirement as a separate sentence for clarity. This now provides clear policy support for proposals coming forward as part of an LDO or SPD
- Development Policy 10 (Community Employment Plans) and the accompanying supporting text needed to be amended to:
 - reflect engagement with OxLEP, take account of the latest evidence available and be capable of being found sound.
 - clearly state what CEPs should cover and how they should be prepared
 - clearly reflect the aims set out in the Oxfordshire Strategic Economic Plan (SEP) and the Local Plan's Strategic Objectives.

- include 'major development' sites as the threshold for when the council may require CEPs to be submitted

For the Publication Version amended the supporting text and policy to respond to the conclusions highlighted above. A core planning principle, set out in paragraph 17 of the NPPF is to take account of and support local strategies to improve health, social and cultural wellbeing for all. Including a policy in the Part 2 plan to promote the use of CEPs makes a strong contribution to this core principle by connecting new development proposals to the local job market and better aligning the available skills to the jobs created. An updated evidence base emerged from OxLEP and the policy and supporting text was updated to accurately reflect the findings of this. The policy and supporting text was also amended to more accurately reflect what it is that CEPs will be expected to cover, taken from the evidence base, which included a suggested template from OxLEP. Additionally, OxLEP suggested including a threshold for when CEPs will be required. However, for flexibility and also to be found sound, a threshold of major development is included in the policy for when the council will seek CEPs to be prepared. This threshold does preclude CEPs being prepared for all new development proposals.

- 2.47 A list of the policies proposed at Preferred Options stage and included in the Publication Version of the plan are provided at Appendix 3.

3.0 RETAIL AND TOWN CENTRES

- 3.1 This section summarises the process the Council has followed to formulate its policies in relation to the retail topic.

National Policy Context

National Planning Policy Framework (NPPF)

- 3.2 The National Planning Policy Framework (NPPF) at Section 2 sets out the Government's approach towards "Ensuring the vitality of town centres". Two of the key aims of the NPPF are the need to take account of the different roles and character of different areas and; promoting vitality of urban areas.¹⁹
- 3.3 The NPPF states that, 'in drawing up local plans, Local Planning Authorities should:
- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality

¹⁹ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 17

- define a network and hierarchy of centres that is resilient to anticipated future economic changes
- define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that makes clear which uses will be permitted in such locations
- promote competitive town centres that provide customer choice and a diverse retail offer and which the individuality of town centres
- retain and enhance existing markets and, where appropriate, reintroduce or create new ones, ensuring that markets remain attractive and competitive
- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local Planning Authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre
- set policies for the consideration of proposals for main town centre uses that cannot be accommodated in or adjacent to town centres.
- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites, and
- where town centres are in decline, Local Planning Authorities should plan positively for their future to encourage economic activity'.²⁰

3.4 The NPPF also supports a prosperous rural economy. It states that to promote a strong rural economy, local and neighbourhood plans should:

- support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres, and
- promote the retention and development of local services and community facilities in villages, such as local shops, meeting places,

²⁰ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 23

sports venues, cultural buildings, public houses and places of worship.²¹

3.5 The NPPF states that 'Local Planning Authorities should have a clear understanding of business needs within the economic markets operating in and across their area'²² and that this should be achieved through joint working with neighbouring authorities and Local Enterprise Partnerships, and through working closely with the business community.

3.6 It also states that this evidence should be used to assess:

- the needs for retail or leisure development
- the role and function of town centres and the relationship between them
- the capacity of existing centres to accommodate new town centre development, and
- locations of deprivation which may benefit from planned remedial action.²³

Planning Practice Guidance (PPG) and Other Legislation and Guidance

3.7 Planning Practice Guidance (PPG) expands on the contents of Section 2 of the NPPF, and states that Local Planning Authorities should take full account of relevant market signals when planning for town centres and should keep their retail land allocations under regular review²⁴. Indicators that should be used to determine the health of town centres include the following²⁵:

- diversity of uses
- proportion of vacant street level property
- commercial yields on non-domestic property
- customers' views and behaviours
- retailer representation and intention to change representation
- commercial rents
- pedestrian flows
- accessibility
- perception of safety and occurrence of crime
- state of town centre environmental quality

Assessing economic development and main town centre uses

²¹ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 28

²² CLG (2012) The National Planning Policy Framework (NPPF), paragraph 160

²³ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 161

²⁴ Paragraph: 004 Reference ID: 2b-004-20140306

²⁵ Paragraph: 005 Reference ID: 2b-005-20140306

3.8 The PPG sets out a methodology that Local Planning Authorities should use to understand the current market for economic and main town centre uses. Local Planning Authorities should consider:

- recent patterns of employment land supply and loss to other uses
- market intelligence
- market signals, such as levels and change in rental values, and differentials between land values in different uses
- public information on employment land and premises required.
- information held by other public sector bodies and utilities in relation to infrastructure constraints
- the existing stock of employment land. This will indicate the demand for and supply of employment land and determine the likely business needs and future market requirements
- the locational and premises requirements of particular types of business, and
- identification of oversupply and evidence of market failure.

Permitted Development Rights

3.9 Government has introduced a range of permitted development rights that allow for greater flexibility of change of use. A number of these rights impact upon retail uses. New permitted development rights include the ability to change of use of shops and financial services to residential dwellings and for shops to be converted into banks and building societies²⁶.

3.10 As part of the consultation document ²⁷informing these changes, the Government accepted *“that there are circumstances where a particular street or individual shop is unlikely to survive the current challenges facing the retail sector... The online retail offer can be important to many and may well, in some cases, complement rather than replace shops. Therefore [Government] want to support the retail offer that will continue to exist on the high street. This means finding new uses for shops that no longer have a future”*. Local Plan policies have been considered and prepared in the knowledge of what is acceptable under the new and prevailing permitted development rights.

Local Policy Context

Local Plan 2031 Part 1: Strategic Sites and Policies (Part 1 plan), Adopted December 2016

²⁶ The Town and Country Planning (General Permitted Development) (England) Order 2015; Part 3 Changes of Use, available at: <http://www.legislation.gov.uk/ukxi/2015/596/schedule/2/part/3/made>

²⁷ CLG (2013) Greater flexibilities for change of use: consultation, available at: <https://www.gov.uk/government/consultations/greater-flexibilities-for-change-of-use>

- 3.11 Strategic Objective 7 of the Local Plan identifies the key objective for retail, stating the need for the Council to maintain and enhance the vitality and viability of the Vale's town centres and local shopping centres in order to strengthen their service centre roles.
- 3.12 The Part 1 plan sets out the following strategic policies relating to retail:
- **Core Policy 10: Abbey Shopping Centre and the Charter, Abingdon-on-Thames** which supports the redevelopment of this area to enhance the retail offer within the town
 - **Core Policy 11: Botley Central Area** which supports the redevelopment of this area to provide for new retail, leisure and commercial provision
 - **Core Policy 16: Didcot A Power Station** which safeguards land at this site for employment, including for ancillary retail uses, and
 - **Core Policy 32: Retail Development and other Main Town Centres Uses** sets out the Council's approach to determining proposals for retail and town centre uses, including a need to undertake a sequential test. It supports the provision of retail development at Market Towns and Local Service Centres and Larger and Smaller Villages where it meets the needs of the local community.
- 3.13 The policy approach of the Part 1 plan is consistent with the NPPF, which requires planning policies to be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period²⁸. This includes allocating suitable sites for retail and other main town centre uses through Core Policy 10 (Abbey Shopping Centre and Charter Area, Abingdon-on-Thames), Core Policy 11 (Botley Central Area) and Core Policy 16 (Didcot A Power Station) in the Part 1 plan.
- 3.14 Core Policy 32 (Retail Development and Other Main Town Centre Uses) sets out the Council's approach to determining proposals for retail and town centre uses. The focus for future retail development and other town centre uses continue to centre on primary and secondary retail frontages and town centre policy areas as defined in the Local Plan 2011 and local shopping centres identified on the Adopted Policies Map²⁹. These will need to be reviewed as part of preparing the Part 2 plan.
- 3.15 Furthermore, Core Policy 32 in the Part 1 plan sets a local floorspace threshold for an impact assessment, based on the recommendations in the 2013 Retail and Town Centre Study. This policy ensures that proposals for

²⁸ CLG (2012) National Planning Policy Framework (NPPF), paragraph 23

²⁹ Vale of White Horse District Council (2016) Vale of White Horse Local Plan 2031 Part 1: Strategic Sites and Policies, Paragraph 6.47, available at: <http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/new-local-plan-2031-part-1-strategic-sites>

retail or other main town centre uses on the edge of or outside town or local shopping centres that exceed the local floorspace threshold will only be supported provided it can be demonstrated in an impact assessment that there are no likely adverse impacts on vitality and viability of nearby centres.

- 3.16 The Council has set a local floorspace threshold in Core Policy 32 of the Part 1 plan of 500 square metres gross retail floorspace elsewhere in the district, based on recommendations in the 2013 Retail and Town Centre Study.

Saved Policies in Local Plan 2011

- 3.17 The Vale of White Horse Local Plan 2011 (LP2011) was adopted in July 2006. The majority of policies in the LP2011 were 'saved' by the Secretary of State in 2009. Following the adoption of the Part 1 plan, a number of saved LP2011 policies were replaced, however some policies continued to be saved through the Part 1 plan and will be replaced by the Part 2 plan.

- 3.18 The saved policies relating to retail that have been reviewed as part of preparing the Part 2 plan are:

- S2 Primary shopping frontages for Abingdon and Wantage
- S3 Secondary shopping frontages for Abingdon and Wantage
- S4 Non retail uses in Abingdon and Wantage Town Centres
- S5 Non retail uses in Faringdon Town Centre
- S6 Upper floors in Town Centres
- S8 The Limborough Road area, Wantage
- S10 Ock Street, Abingdon
- S11 Park Road, Faringdon
- S12 Policies for local shopping centres
- S13 Development of village shops
- S14 Loss of village and other local shops
- S15 Garages and garage shops

- 3.19 An assessment of these saved policies has been undertaken to consider if these policies remain appropriate and consistent with national policy and guidance, and if they should be replaced or updated by new policies within the Part 2 plan. **Appendix 2** shows the outcome of this assessment. In summary, 8 of the 12 saved policies have been updated or carried forward into the Part 2 plan with 4 saved policies not being replaced.

- 3.20 It is not considered necessary to replace saved policy S8 of the Local Plan 2011 as the majority of the site is now redeveloped and will be protected by other relevant policies in the Local Plan 2031. Similarly, it is considered there is no requirement to take forward saved policies S10 and S11 as sufficient detail is provided in Core Policies 37 and 38 of the Part 1 plan and, in relation

to Park Road, Faringdon this site is covered by policy in the Faringdon Neighbourhood Plan which now forms part of the Development Plan.

- 3.21 Saved policy S15 of the Local Plan 2011 is also not being replaced, as the detail of this policy will be covered by other policies in the Part 2 plan related to village and local shops.

Evidence

- 3.22 To support the preparation of up to date Development Management Policies in the Part 2 plan that support economic prosperity, evidence has been drawn from a range of sources. Set out below is a short summary of each document that helped to shape the plan.

Retail and Town Centres Study Update (2017)

- 3.23 An update to the Retail and Town Centres Study 2013 was undertaken in 2016 and published in 2017 by Nathaniel Lichfield and Partners³⁰. The study included an audit of the main town centre, primary and secondary shopping frontage boundaries, and updated the retail and leisure capacity predictions to accommodate the additional growth proposed in the Part 2 plan.
- 3.24 The study indicates that previous saved policies from the 2011 Local Plan have been successful in retaining existing retail uses and preventing changes of use to non-A1 uses in the town centres. The percentages of Class A1 uses within the district's town centres are all at, or above, the national average of 56.5% and show that:
- within the primary frontages in Abingdon-on-Thames the proportion of Class A1 retail uses within the primary frontages was 62.6% at the end of 2016. The equivalent figure for secondary frontages was 46.5%. The number of Class A1 and other A class uses has not reduced significantly and the number of vacant units has reduced
 - in Wantage the primary frontages have 59.2% Class A1 and the secondary frontages 54.2%, and
 - In Faringdon town centre the proportion of Class A uses is 56.8%.
- 3.25 The study suggests that town centre boundaries, primary and secondary shopping frontage designations have the following dual functions:
- i) defining the areas where new retail and main town centres uses will be focused consistent with the sequential approach and/or used to determine what is considered to be in-centre, edge of centre and out of centre development, and

³⁰ Nathaniel Litchfield and Partners* (NLP) (2017) Retail and Town Centres Study Update, available at: www.whitehorsedc.gov.uk/LPP2 *NLP is now known as Lichfields.

- ii) frontage policies seek to control the mix of uses in order to provide an appropriate balance of uses to maintain the vitality and viability of the centre and to prevent amenity issues such as smells and noise.

3.26 The study suggests the following changes to the district's primary and secondary shopping frontages:

- in Abingdon-on-Thames, the following units could be designated as secondary frontage to protect the existing Class A uses and to maintain footfall between Coexter House and the rest of the town centre:
 - Numbers 1 and 2 The Square (Barclays and Ask Restaurant);
 - Numbers 2 to 8 (even) Ock Street (including Lloyds bank); and
 - Numbers 5 to 15 (odd) Ock Street)
- in Wantage, to consider re-designating the primary shopping frontages on Mill Street as secondary shopping frontages to provide more flexibility and ensure vacancies do not emerge in this area
- in Wantage, to consider designating Arbery Arcade as secondary shopping frontage in order to protect the Class A uses
- in Wantage, the Limborough Road Area (Saved Policy S8) has been successfully implemented and is now occupied. New primary shopping frontages should be designated to protect the new Class A1 retail in this area, and
- following the Preferred Options consultation the study was reviewed and updated. The report recommends considering designating King's Walk in Wantage as primary shopping frontage to protect the new Class A1 retail in this area.

Viability Update (2017) and Viability Statement (October 2017)

- 3.27 The Council commissioned HDH Planning and Development Ltd to undertake a viability assessment³¹ of the Part 2 plan. Viability assessment tests the effectiveness of the cumulative impact of the policies in the Part 2 plan and whether they would put a development at risk.
- 3.28 The Viability Update and Statement have assessed the viability of the housing policies and conclude that the retail development management policies do not add additional burdens to developers.

Sustainability Appraisal

- 3.29 Sustainability Appraisal (SA) was undertaken on all of the Development Management Policies and the conclusions relating to policies that support

³¹ HDH Planning and Development Ltd. (2017) Local Plan 2031 Part 2: Viability Update and Statement

economic prosperity are set out below. An SA Report should identify, describe and evaluate the likely significant effects of implementing the plan and reasonable alternatives. An interim SA report was published alongside the 'Preferred Options' version of the Local Plan 2031 Part 2 document for public consultation in March 2017 and final SA Report is published alongside the Publication Version of the plan.

- 3.30 These retail policies perform well, and should appropriately complement the Core Policies as set out in the Part 1 plan. In particular the development policies provide additional detail to support Core Policies 28-32. In conclusion, the Publication Version of the Part 2 plan is predicted to result in significant positive effects in relation to the services and facilities and economy objectives.

Summary of Consultation

- 3.31 The Council has undertaken both formal consultation and informal engagement which has shaped the policies. Below is a summary of the consultation and engagement that has supported the preparation of the policies.

Informal Engagement

- 3.32 The Council undertook informal engagement officers with the council's Development Management and Economic Development teams in November 2016 to inform preparation of the Part 2 plan. The responses received have identified a number of issues that helped inform policy development to inform the Part 2 plan Preferred Options Consultation. Key comments included:
- The council's Development Management Team commented that an additional policy on retail parks should be included in the Part 2 plan to restrict uses to bulky goods retail uses at Fairacres Retail Park, Abingdon-on-Thames and Seacourt Tower Business Park, Botley, and
 - The Development Management Team also commented that the existing saved policies on shopping frontages are useful. They also added that policy and accompanying text in the Part 2 plan should include what level of information would be required to support an application for change of use from retail to other uses.
- 3.33 The Council undertook a further stage of informal engagement with the council's Development Management and Economic Development teams July 2017 following Preferred Options consultation. The responses received have helped to further refine the policies for inclusion in the Publication Version of the Part 2 plan. Key comments were as follows:

- the council's Development Management Team commented that Development Policy 12 (Change of Use of Retail to Other Uses) and the accompanying text should be refined to provide further clarity and to demonstrate the types of change of use that would be permitted and why, whilst allowing some flexibility. The team were supportive of an approach consisting of sub-policies to achieve this, , and
- the council's Economic Development Team commented that Development Policy 12 (Change of Use of Retail to Other Uses) and the accompanying text should allow some flexibility to avoid vacant retail units becoming dominant. The policies could be merged, where possible, but there is a need to recognise that the smaller centre of Faringdon does not contain Primary or Secondary Shopping Frontages. The team were supportive of an approach consisting of sub-policies to achieve this

Draft Local Plan 2031 Part 2: Preferred Options Consultation (March 2017)

- 3.34 The Council published the Preferred Options version of the Local Plan 2031 Part 2 in March 2017 for public consultation. A number of comments were received in relation to the retail policies. These comments have identified a number of key issues that have helped to refine the policies for inclusion in the 'Publication Version' of the Local Plan 2031 Part 2. Key comments are summarised in **Table 2** below. All comments received from public consultation on the Preferred Options Version of the Part 2 plan, are summarised and available to view in **Appendix 3** of the **Consultation Statement**.

Table 2: Summary of consultation responses related to retail

Policy	Summary	Council response
Development Policy 12: Changes of Use of Retail Units	<p>Comments suggested that the policy does not mention car parking and the policy restricts a change of use to residential because it will result in a loss of goods and services.</p> <p>A comment supported the designation of Sainsbury's as part of the designation of Limborough Road in Wantage as primary frontage.</p> <p>There were also comments:</p> <ul style="list-style-type: none"> • expressing the belief that Kings Walk should be included in the RTCS Report, 2017. • identifying concern that the policy will offer an opportunity for developers to change primary and secondary retail frontages to residential accommodation (C3). 	<p>All applications, including retail uses, will be considered alongside the Council's Design Guide SPD and the Oxfordshire County Council Parking Standards as set out in Part 1 plan policy. Development will be permitted if the application can demonstrate the proposal will add to the range and variety of goods and services available to the local residents. Any new proposals will have to meet the Local Plan's design standards and criteria, the Council's Urban Design Guide SPD, and Oxfordshire County Council Parking Standards.</p> <p>This support is noted.</p> <p>The Vale of White Horse Retail and Town Centres Uses Study (Updated March, 2017) (RTCS, 2017), read alongside the RTCS, 2013 and the Addendum, 2014, assesses the implications of the additional strategic housing options, and the likely associated changes in the retail floor-space needs arising from the revised population figures. This includes a substantial audit of retail services and uses with primary and secondary frontages within the main settlements of the District.</p> <p>The 2017 report recommended, some minor alterations to the existing retail areas was needed to reflect changing circumstances in population growth, market trends, new and existing facilities and emerging policies from Part 2 of the Plan. This can be found in Appendix H of the Local Plan Part 2. The 2017 report, used a sequential approach to define the</p>

	<ul style="list-style-type: none"> concerned the policy will offer an opportunity for developers to change primary and secondary retail frontages to residential accommodation (C3). stating allocations should be made to meet the expected demand for Retail Floorspace. 	<p>area for town centre boundaries and shopping frontages so that it can determine what is considered to be in-centre, edge of centre and out of centre, and whether a retail impact assessment is required.</p> <p>The Council consider that this approach is most prudent to control the mix of uses in order to provide an appropriate balance of uses to maintain the vitality and viability of the centre. This is also consistent with Core Policy 32 and DMP 12, in which any change of use application will be subject to criteria including, the impact on the function, viability, character and appearance of existing provision and the amenity of neighbouring uses.</p>
Development Policy 13: Village and Local Shops	A comment highlights that facilities are closing in villages and existing facilities are struggling to meet the existing demand.	The Council work with other service providers such as Oxfordshire County Council and the CCG to ensure there is appropriate facilities to meet any new development within local communities
Development Policy 14: Retail Parks	A comment questions the definition of bulky goods. A comment also questioned if the policy can be limited to ancillary services which could be distributed on the retail parks and supported the Policy in essence. However, Bulky Goods is not a supported reference in national policy terms or has been used by the Council in previous planning applications and/or decisions. For the Policy to work with CP32, there is a need to reference all retail parks outside existing centres.	Bulky Goods, as defined in the Planning Portal Glossary is: 'Goods of a large nature (for example DIY, furniture, carpets) that sometimes require large areas for storage or display.' A definition will be added to the plan glossary. The districts two main retail parks, Fairacres (Abingdon-on-Thames) and Seacourt Retail Park (Botley, Oxford), which have been specifically established to provide outlets for bulky goods distributors. Consequently, DMP 14 provides a robust planning framework to ensure any change of use application must conform to DMP 14, Core Policy 32 and the Local Plan, read as a whole, and therefore complies with the Local Plan's spatial strategy.

	<p>A comment suggest that because the policy leaves open the possibility of developers applying for change of uses at Botley retail park, which is not aligned to the imminent renewal of the park, the policy should be removed.</p>	<p>Applications brought forward at the Seacourt Retail Park will only be permitted if they comply with policies contained in the Local Plan. Development Policy 14, offers sufficient flexibility, while ensuring any change of use will not be detrimental to the existing uses and areas of Botley central area and Abingdon-on-Thames, before any development will be permitted.</p>
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Key Issues

3.35 The following key issues were considered when preparing policies for inclusion in the 'Preferred Options' for the Part 2 plan:

- national policy highlights the importance of defining town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres,
- national policy also highlights the importance of including policies that make clear which uses will be permitted in which locations
- National guidance states that Local plans should be as focused, concise and accessible as possible and when drafting policies local planning authorities should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development. At the time, the council considered it prudent to combine these policies to prepare a concise and clear local plan.
- local evidence provided justification for reviewing the primary and secondary shopping frontages in Abingdon-on-Thames and Wantage
- informal engagement highlighted the importance of restricting uses to bulky goods retail uses at Fairacres Retail Park, Abingdon-on-Thames and Seacourt Tower, Botley, and
- scoping of the saved policies, has highlighted the importance of addressing the loss and/or change of use from retail units to other uses.

3.36 The key issues identified as part of the process of refining the proposed retail policies for inclusion in the 'Publication Version of the Part 2 plan, were:

- to review the Retail and Town Centres Study to consider if there is evidence available to propose designating King's Walk in Wantage as a Primary Shopping Frontage to reflect the new Class A1 retail in this area
- to consider including a definition of 'Bulky Goods' in the glossary for the Part 2 plan to provide further clarity in Development Policy 14 (Retail Parks), which covers the uses that will be restricted on retail parks, including at Fairacres at Abingdon-on-Thames and Seacourt Tower, in Botley
- Development Policy 12 (Change of Use of Retail Units) should be refined to more closely align with the local evidence as set out in the latest Retail and Town Centres Study
- Development Policy 12 (Change of Use of Retail Units) should include sub-policies to provide further clarity to assist in assessing development proposals of this nature.

Conclusions

- 3.37 Set out below are the conclusions that the council reached to inform the retail policies that support economic prosperity in the Part 2 plan. These conclusions were reached following consideration of the key issues that were identified from the emerging evidence base, and from the informal and formal stages of engagement.
- 3.38 The conclusions in relation to the employment policies, for consideration in the Preferred Options for the Part 2 plan were as follows:
- to align with national policy and guidance to prepare as concise and accessible policies as possible, Saved policies S2, S3, S4, S5, S6 and S12 were combined into a single policy in the Part 2 plan, which would address the change of use and loss of retail to other uses. In line with national policy that emphasises the importance of town centres, the Part 2 plan policy sought to maintain and enhance the vitality and viability of the district's town centres and local shopping centres. To add detail to Core Policy 32, which supports proposals for new retail development and town centres uses in the market towns, the policy covered the change of use from retail to other uses. To do so it was seeking to reinforce the service centre roles of the main settlements in the district by concentrating retail provision in the town centres of Abingdon-on-Thames, Wantage and Faringdon, and the smaller centres of Grove and Botley.
 - Saved policies S13 and S14 were combined into a single policy in relation to village and local shops. The combined policy would include the protection of existing shops and the provision of new shops subject to certain criteria. In line with national policy, which is clear on the need to promote the retention and development of local services and communities facilities. The council recognised the importance of small neighbourhood or village shops to local communities and prepared a policy seeking to guard against their unnecessary loss. The policy added further detail to the Part 1 plan, which seeks to ensure that development is supported by a sufficient range of services and facilities.
 - Saved policy S8 covering The Limborough Road area at Wantage is no longer needed and should not be updated or carried forward into the Part 2 plan. This policy is now fully implemented and the council concluded that it does not need to be taken forward. New retail on Limborough Road was designated as Primary Retail Frontage.
 - The replacement of Saved Policy S10 relating to Ock Street in Abingdon-on-Thames was considered, however it is regarded that Core Policies 37 and 38 in the Local Plan 2031 will provide a sufficient

framework for determining such proposals. Therefore a replacement policy is not necessary.

- The replacement of Saved Policy S11 relating to Park Road in Faringdon was considered, however it is regarded that other policies in the Faringdon Neighbourhood Plan will provide a sufficient framework for determining such proposals. Therefore a replacement policy is not necessary.
- The replacement of Saved Policy S15 relating to Garages and Garage Shops was considered, however it is regarded that other policies in the Local Plan 2031, such as Development Policy 13 (Village and Local Shops) will provide a sufficient framework for determining such proposals. Therefore a replacement policy is not necessary.
- an additional policy was included that covers retail parks, with a particular focus on Fairacres at Abingdon and Seacourt Tower at Botley, and
- Further policies relating to Abbey Shopping Centre, the Charter, Abingdon-on-Thames and the Botley Central Area, Botley were considered, however it is regarded that Core Policies 10 and 11 in the Part 1 plan provide a sufficient level of detail.

3.39 The recommendations in relation to the employment policies for consideration in the Publication Version of the Part 2 plan were as follows:

- Development Policy 12 (Change of Use of Retail to Other Uses) is more closely aligned to the local evidence as set out in the Retail and Town Centre Study. The Study considers that the saved policies in the Local Plan 2011 remain fit for purpose and recommends no change to the approach. Following discussions with specialist officers, and taking into account the recommendations from this Study, the Council consider it appropriate to include sub-policies to more accurately reflect the existing approach set out by the saved policies. It is also considered by the council that this approach will help provide further clarity and assist in determining proposals of this nature.
- Development Policy 12 (Change of Use of Retail to Other Uses) and accompanying text is updated to reflect national policy and guidance, including current Permitted Development Rights that allow proposals for the change of use of retail to other uses without requiring planning permission. The policy is in line with national policy, including that highlighted earlier in the section. Importantly, there is a 'golden-thread' of sustainable development running throughout national policy that requires local planning authorities to positively seek opportunities to meet the development needs of their area³² and the policy is drafted with this in mind.

³² National Planning Policy Framework (NPPF), paragraph 14

- Development Policy 12 (Change of Use of Retail to Other Uses) includes five sub-policies covering the following scenarios:
 - a policy that seeks to protect retail space within Primary Shopping Frontages
 - a policy that seeks to support the change of use from retail to other uses within Secondary Shopping Frontage subject to certain criteria
 - a policy that seeks to support the change of use from retail to other uses within the town centres of Abingdon-on-Thames and Wantage and supports access to upper floors in town centres
 - a policy that seeks to protect retail space within Faringdon Town Centre, and
 - a policy that seeks to support the change of use from retail to other uses within Local Shopping Centres.
- the policy seeking to protect retail space within Primary Shopping Frontages, is drafted to allow flexibility to avoid vacant retail units becoming dominant by expecting applicants to demonstrate that the unit (s) has no reasonable prospect of being used or redeveloped for retail purposes through a marketing exercise.
- the policy seeking to protect retail space within Faringdon Town Centre is drafted to continue to allow some flexibility to avoid vacant units becoming dominant, by expecting applicants to retain active frontages in accordance with the Design Guide Supplementary Planning Document and other relevant policies of the Development Plan, and
- the accompanying text to Development Policy 12 (Change of Use of Retail Units to Other Uses) provides a link to other relevant policies in the Part 1 and Part 2 plan and the Design Guide Supplementary Planning Document. The council included paragraphs of supporting text to clearly link to other relevant documents in the Development Plan.
- the accompanying text to Development Policy 12 (Change of Use of Retail Units to Other Uses) includes a reference to minor changes to Primary and Secondary Retail Frontage, following recommendations set out in the Retail and Town Centre Study. The Appendix to the Part 2 plan presents the changes proposed to the Adopted Policies Map. The council concluded that the recommendations of the Study are taken forward and the proposed changes include the following:
 - new Primary Shopping Frontages designated at Kings Walk, Wantage and Limborough Road, Wantage, and
 - new Secondary Shopping Frontages designated for the Square and Ock Street, Abingdon-on-Thames and Arbery Arcade, Wantage

- the supporting text accompanying Development Policy 14 (Retail Parks), should include a definition of 'bulky goods'. This definition is added to the Glossary for the Part 2 plan.

3.40 A list of the policies proposed at Preferred Options stage and included in the Publication Version of the plan are provided at Appendix 3.

4.0 VISITOR ECONOMY

4.1 This section summarises the process the Council has followed to formulate its policies in relation to the visitor economy topic.

National Policy Context

National Planning Policy Framework (NPPF)

- 4.2 The National Planning Policy Framework (NPPF) at Sections 2 and 3, sets out the Government's key principles in promoting the importance of tourism development as a key part of ensuring the viability of town centres and supporting a prosperous rural economy. The NPPF suggests that Local Planning Authorities should consider allocating a range of suitable sites to meet the scale and type of tourism development needed in town centres³³ and support sustainable rural tourism and leisure developments that benefit businesses, communities and visitors, whilst respecting the character of the countryside.³⁴
- 4.3 National policy also states that local and neighbourhood plans should include the need to support the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres.

Planning Practice Guidance (PPG)

- 4.4 The Planning Practice Guidance (PPG) provides additional guidance on the visitor economy. In particular, it suggests that Local Planning Authorities, should articulate a vision for the visitor economy in the Local Plan, including identifying key locations for the visitor economy. When planning for the visitor economy, Local Planning Authorities should:
- consider the specific needs of the tourist industry, including particular locational or operational requirements
 - engage with representatives of the tourism industry

³³ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 23

³⁴ CLG (2012) The National Planning Policy Framework (NPPF), paragraph 28

- examine the broader social, economic, and environmental impacts of tourism
- analyse the opportunities for tourism to support local services, vibrancy and enhance the built environment, and
- have regard to non-planning guidance produced by other Government Departments.³⁵

Local Policy Context

Local Plan 2031 Part 1: Strategic Sites and Policies (Part 1 plan), Adopted December 2016

- 4.5 Strategic Objective 5 of the Local Plan 2031 Part 1 identifies the key objective for tourism and the visitor economy, stating the need for the Council to support a strong sustainable economy within the district that includes the visitor economy.
- 4.6 The Part 1 plan sets out the following strategic policy relating to the visitor economy:
- **Core Policy 31: Development to Support the Visitor Economy** seeks to support the visitor and tourism sector across the district. The policy supports new development in the visitor economy subject to certain criteria including location, scale and character.

Saved Policies in Local Plan 2011

- 4.7 The Vale of White Horse Local Plan 2011 (LP2011) was adopted in July 2006. The majority of policies in the LP2011 were 'saved' by the Secretary of State in 2009. Following the adoption of the Part 1 plan, a number of saved LP2011 policies were replaced, however some policies continued to be saved through the Part 1 plan and will be replaced by the Part 2 plan.
- 4.8 The saved policies relating to the visitor economy that have been reviewed as part of preparing the Part 2 plan are:
- T2 Tourist facilities on existing sites
 - T4 Camping and caravanning
- 4.9 An assessment of these saved policies has been undertaken to consider if these policies remain appropriate and consistent with national policy and guidance, and if they should be replaced or updated by new policies within the Part 2 plan. **Appendix 3** shows the outcome of this assessment. In summary, none of the policies have been updated or carried forward into the

³⁵ Planning Practice Guidance, Reference ID: 2b-007-20140306

Part 2 plan in the same form, however one policy has merged with policies in the 'Protecting the Environment and Responding to Climate Change' theme.

- 4.10 It is considered unnecessary to replace saved policy T2 in the Local Plan 2011 as Core Policy 31 and Core Policy 29 in the Part 1 plan provide sufficient level of detail to determine proposals of this nature.

Evidence

- 4.11 To support the preparation of Policies in the Part 2 plan, evidence has been considered. Set out below is a short summary of each document that helped to shape the plan.

Hotels Needs Assessment (2014)

- 4.12 A Hotels Needs Assessment (2014) was carried out for South Oxfordshire and Vale of White Horse by Hotel Solutions³⁶. The report has informed the development of Core Policy 31 in the adopted Local Plan 2031 Part 1, in particular providing a flexible approach to development that supports the visitor economy by supporting small-scale development proposals in the open countryside subject to certain factors including scale, heritage and character.

Viability Update (2017) and Viability Statement (October 2017)

- 4.13 The Council commissioned HDH Planning and Development Ltd to undertake a viability assessment³⁷ of the Part 2 plan. Viability assessment tests the effectiveness of the cumulative impact of the policies in the Part 2 plan and whether they would put a development at risk.
- 4.14 The Viability Update and Statement have assessed the viability of the housing policies and conclude that the employment development management policies do not add additional burdens to developers.

Sustainability Appraisal

- 4.15 Sustainability Appraisal (SA) was undertaken on all of the Development Management Policies and the conclusions relating to policies that support economic prosperity are set out below. An SA Report should identify, describe and evaluate the likely significant effects of implementing the plan and reasonable alternatives. An interim SA report was published alongside the 'Preferred Options' version of the Local Plan 2031 Part 2 document for public consultation in March 2017 and final SA Report is published alongside the Publication Version of the plan.

³⁶ Hotel Solutions (2014) South Oxfordshire and Vale of White Horse Hotel Needs Assessment

³⁷ HDH Planning and Development Ltd. (2017) Local Plan 2031 Part 2: Viability Update and Statement.

- 4.16 The appraisal of development policies relating to visitor economy in the SA Report consider that these policies perform well, and should appropriately compliment the Core Policies as set out in the Part 1 plan. In particular the development policies provide additional detail to support Core Policies 28-32, Core Policy 37 (Design and Local Distinctiveness) and Core Policy 44 (Landscape). In conclusion, the Publication Version of the Part 2 plan is predicted to result in significant positive effects in relation to the economy objectives and certain landscape objectives.

Summary of Consultation

- 4.17 The Council has undertaken both formal consultation and informal engagement which has shaped the policies. Below is a summary of the consultation and engagement that has supported the preparation of the policies.

Informal Engagement

- 4.18 The Council undertook informal engagement with specialist officers within the Council, including the Economic Development team, in November 2016 to inform preparation of the Part 2 plan. The responses received have identified a number of issues that helped inform policy development to inform the Part 2 plan Preferred Options Consultation. Key comments included:
- the Development Management Team commented that the existing saved policy T4 related to camping and caravanning sites is useful and should be updated in the Part 2 plan, and
 - the Economic Development Team commented that the existing saved policy T4 related to camping and caravanning sites should make reference to other camping activities e.g. luxury camping.
- 4.19 The Council undertook a further stage of informal engagement with specialist officers within the Council in July 2017 following Preferred Options consultation. No further responses were received.

Draft Local Plan 2031 Part 2: Preferred Options Consultation (March 2017)

- 4.20 The Council published the Preferred Options version of the Local Plan 2031 Part 2 in March 2017 for public consultation. A number of comments were received in relation to the visitor economy policies. These comments have identified a number of key issues that have helped to refine the policies for inclusion in the 'Publication Version' of the Local Plan 2031 Part 2. Key comments are summarised in **Table 3** below. All comments received from public consultation on the Preferred Options Version of the Part 2 plan, are summarised and available to view in **Appendix 3** of the **Consultation Statement**.

Table 3: Summary of consultation responses related to the visitor economy

Policy	Summary	Council response
Development Policy 11: Rural Diversification and Equestrian Development	A few comments suggested that there is merit in considering further the need for local policies to protect and where possible enhance existing bridleways.	The Council consider Development Policy on Public Rights of Way sufficiently in the Part 2 plan covers this level of detail.
	A comment suggested that it would be appropriate for this policy to include additional criteria to assess development proposals located within the Oxford Green Belt.	The Plan should be read as a whole and as such the policies regarding the countryside and green belt will apply without specific mention within this policy. However an amendment has been made to the supporting text highlighting the need to consider CP13.
	A comment criticised the criteria within the policy which sets out restrictions on new farm shops where they should not undermine the deliverability, viability and vitality of shopping provisions in nearby villages	The Council considers this criteria to be in conformity with national policy ensuring there is not an impact on existing provision in settlement centres.
	A comment stated that there is no policy to enable the development of farm buildings for agriculture and is therefore not meeting the requirements within the NPPF.	This is sufficiently addressed through Core Policy 28 in the Part 1 plan and where appropriate through permitted development rights. Equestrian development forms part of the rural economy and needs to be supported in line with national policy.
	A few comments supported this policy.	Support is welcomed.

Key Issues

- 4.21 The following key issues were considered when preparing policies for inclusion in the 'Preferred Options' version for the Part 2 plan:
- proposals for the diversification in the types of caravanning and camping facilities that are available needs to be considered. For example, facilities are being developed across the country for more bespoke activities such as glamping (luxury camping), shepherds' huts, yurts, and wild camping
 - policies related to tourism and the visitor economy in the Part 2 plan may duplicate requirements set out in Core Policy 31 of the Local Plan 2031 Part 1, and
 - the Part 2 plan should consider supporting proposals for small-scale recreational facilities related to tourism and leisure development in the open countryside.
- 4.22 The key issues considered as part of the process of refining the proposed visitor economy policies for inclusion in the Publication Version of the Part 2 plan were:
- consider including a reference in the policy and/or accompanying text to Core Policy 13 (Oxford Green Belt) in the Part 2 plan, to ensure that development proposals located within the Oxford Green Belt comply with the Part 1 plan policy.

Conclusions

- 4.23 Set out below are the recommendations that informed the policies in the Part 2 plan. These recommendations emerged from the key issues that were identified following consideration of the emerging evidence base, and the informal and formal stages of engagement.
- 4.24 The recommendations in relation to the visitor economy policies for consideration in the Preferred Options for the Part 2 plan were as follows:
- a policy was included relating to proposals for rural diversification and equestrian developments
 - saved policy T4 in the Local Plan 2011 was retained and integrated into a policy in the Part 2 plan to support small-scale recreational facilities in the open countryside reflecting informal engagement. This is covered in the Leisure section of the Protecting the Environment and Responding to Climate Change Theme³⁸, and

³⁸ Protecting the Environment and Responding to Climate Change Topic Paper

- Saved policy T2 in the Local Plan 2011 is not replaced in the Part 2 plan as Core Policies 29 and 31 in the Part 1 plan provide sufficient level of detail to determine such proposals.

4.25 The recommendations in relation to the visitor economy policies for consideration in the Publication Version of the Part 2 plan were as follows:

- the policy relating to Rural Diversification and Equestrian Development is amended to be more closely aligned to Core Policy 28 in the Part 1 plan in relation to proposals involving the 're-use, conversion or adaptation' of suitable existing buildings. This amendment also helps to provide further clarity when assessing proposals of this nature reflecting consultation comments, and
- the accompanying text to Rural Diversification and Equestrian Development policy is amended to refer to the need for development proposals located within the Oxford Green Belt to comply with Core Policy 13 in the Part 1 plan, reflecting consultation comments.

4.26 A list of the policies proposed at Preferred Options stage and included in the Publication Version of the plan are provided at Appendix 3.

APPENDIX 1: ASSESSMENT OF SAVED LOCAL PLAN 2011 EMPLOYMENT POLICIES

<i>Policy</i>	<i>Summary of Saved Policy</i>	<i>Consistency with NPPF</i>	<i>Reasoning</i>	<i>Inclusion in Local Plan 2031 Part 2?</i>
E1 Abingdon (specific allocations to be saved as identified in Core Policy 6; other allocations will not be saved)	Specific policy regarding employment within Abingdon-on-Thames identifying acceptable employment uses and specific requirements.	Fully Consistent	Part of this policy is already covered by Core Policy 6. The remainder restricts certain employment uses at these sites that is not enabling flexible employment uses and does not maximise each site's ability to remain active. Site specific requirements are also covered by other Part 1 plan policies.	No
E2 Botley Area (specific allocations to be saved as identified in the Core Policy 6; other allocations will not be saved)	Specific policy regarding employment within Botley identifying acceptable employment uses and specific requirements.	Fully Consistent		No
E3 Faringdon (specific allocations to be saved as identified in Core Policy 6; other allocations will not be saved)	Specific policy regarding employment within Faringdon identifying acceptable employment uses and specific requirements.	Fully Consistent		No
E4 Grove Technology Park	Specific policy regarding employment at Grove Technology Park identifying acceptable employment uses and specific requirements.	Fully Consistent		No
E5 Milton Park	Specific policy regarding employment at Milton Park identifying acceptable employment uses and specific requirements.	Fully Consistent	It is considered that there are already sufficient policies in the Part 1 plan to address the specific requirements of employment sites in the district for the plan period.	No
E6 West of Didcot Power Station	Specific policy regarding employment at West of Didcot Power Station identifying acceptable employment uses and specific requirements.	Fully Consistent	It is considered that there are already sufficient policies in the Part 1 plan to address the specific requirements of employment sites in the district for the plan period.	No
E7 Harwell Science and Innovation Campus	Specific policy regarding employment at Harwell Campus identifying acceptable	Fully Consistent	The Part 2 plan proposes a new housing allocation within the north of the campus, seeking to promote a campus style live-work environment for those employed on the site.	Yes

Policy	Summary of Saved Policy	Consistency with NPPF	Reasoning	Inclusion in Local Plan 2031 Part 2?
	employment uses and specific requirements.		It is important that this vision for the campus is reflected in revisions to a Harwell Campus specific policy and can be delivered through a plan-led approach. A new policy for Harwell Campus is proposed to be included within the Part 2 plan as part of the policies for the South East Vale Sub Area Strategy.	
E8 Local Rural Sites	Identifies rural employment sites and acceptable employment uses at these sites.	Fully Consistent	Already covered by Core Policy 29	No
E11 Rural Multi-User Sites	Identifies rural multi user employment sites and acceptable employment uses at these sites.	Consistent in part	Already covered by Core Policy 29	No
E12 Large Campus Style Sites	Identifies large campus employment sites and acceptable employment uses at these sites.	Consistent in part	Already covered by Core Policy 29	No
E13 Ancillary uses on key employment sites	Enables appropriate ancillary uses to be permitted on employment sites	Fully Consistent	Links to Core Policy 29 however it also provides helpful further detail to assist in determining planning applications.	Yes
E15 Steventon Storage Facility (former Home Office Stores Site, Steventon) E16 New buildings required for agricultural purposes	Restricts employment development at Steventon Storage Facility.	Not Consistent	Not considered to be consistent with the NPPF as the policy currently restricts alternative uses being considered, even where there is no reasonable prospect of the site being used for the allocated employment use. The policy is also rarely applied by the Development Management Team.	No

<i>Policy</i>	<i>Summary of Saved Policy</i>	<i>Consistency with NPPF</i>	<i>Reasoning</i>	<i>Inclusion in Local Plan 2031 Part 2?</i>
E16 New buildings required for agricultural purposes	Enables proposals for new buildings and development for the necessary operation of agriculture or forestry.	Fully Consistent	Sufficiently covered through existing permitted development rights or where full planning permission is required, through the criteria set out in Core Policy 28.	No
E18 Farm shops	Policies support the provision and expansion of Farm Shops.	Fully Consistent	These are useful policies but require updating to take account of supporting sustainable growth and expansion of business and enterprise in rural areas in line with the NPPF including the development and diversification of agricultural and other land-based rural businesses. However, there is no need to have separate policies going forward.	Yes. Combine into a single policy on rural diversification and equestrian development
E19 Farm shops		Fully Consistent		
E20 The keeping, rearing and training of horses	Policies enable appropriate development for keeping, rearing and training of horses and protection of loss.	Fully Consistent		
E21 Loss of facilities for the keeping, rearing and training of horses		Fully Consistent		

APPENDIX 2: ASSESSMENT OF SAVED LOCAL PLAN 2011 RETAIL POLICIES

Policy	Summary of Saved Policy	Consistency with NPPF	Reasoning	Inclusion in Local Plan 2031 Part 2?
S2 Primary shopping frontages for Abingdon and Wantage	Indicates that proposals which involve a net loss of class A1 shopping floorspace at ground floor level in the primary shopping frontages will not be permitted.	Fully Consistent	Support for retail development in this area is already set out in Core Policy 32. Local Plan 2031 Part 2 needs to address the loss of/change of use from retail to other uses. Where possible, the policies can be merged for conciseness, whilst retaining separate sub-policies, where appropriate, to maintain flexibility and to apply certain criteria.	Yes. Combine into a single policy for the change of use of retail uses to other uses, with sub-policies.
S3 Secondary shopping frontages for Abingdon and Wantage	Indicates that permission will be granted within the secondary frontages for uses within classes A2, A3 and for amusement/entertainment uses provided that certain criteria are met.	Fully Consistent	Support for retail development in this area is already set out in Core Policy 32. Local Plan 2031 Part 2 needs to address the loss of/change of use from retail to other uses. Where possible, the policies can be merged for conciseness, whilst retaining separate sub-policies, where appropriate, to maintain flexibility and to apply certain criteria.	Yes. Combine into a single policy for the change of use of retail uses to other uses, with sub-policies.
S4 Non retail uses in Abingdon and Wantage Town Centres	Indicates that proposals for use classes A2, A3, B1 (offices), healthcare facilities (within D1), amusement / entertainment uses and for residential accommodation (C3) will be permitted within the town centres (other than on the ground floor of premises within the primary and secondary frontages) provided that there would be no demonstrable harm caused to the living conditions of any neighbouring residents.	Fully Consistent	Support for retail development in this area is already set out in Core Policy 32. Local Plan 2031 Part 2 needs to address the loss of/change of use from retail to other uses. Where possible, the policies can be merged for conciseness, whilst retaining separate sub-policies, where appropriate, to maintain flexibility and to apply certain criteria.	Yes. Combine into a single policy for the change of use of retail uses to other uses, with sub-policies.
S5 Non retail uses in Faringdon Town Centre	Indicates that, within the town centre area of Faringdon, permission will be granted for uses within classes A2 and A3 provided that certain criteria are met.	Fully Consistent	Support for retail development in this area is already set out in Core Policy 32. Local Plan 2031 Part 2 needs to address the loss of/change of use from retail to other uses.	Yes. Combine into a single policy for the change of use of retail

	Changes of use from classes A1, A2 and A3 to other uses will not be permitted on ground floor frontages. New residential, healthcare or B1 uses will be permitted on upper floors subject to there being no demonstrable harm to the living conditions of any neighbouring residents.		Where possible, the policies can be merged for conciseness, whilst retaining separate sub-policies, where appropriate, to maintain flexibility and to apply certain criteria.	uses to other uses, with sub-policies.
S6 Upper floors in Town Centres	Indicates that new shopping and commercial development within the town centres shall, where possible, incorporate specific provision to maintain or improve the means of access to upper floors.	Fully Consistent	Support for this policy is provided in Core Policy 29 of the Local Plan 2031 Part 1 and the emerging policy related to retail in the Local Plan 2031 Part 2, but this policy is retained to encourage access to upper floors to be incorporated in development proposals.	Yes. Combine into a single policy for the change of use of retail uses to other uses, with sub-policies.
S8 The Limborough Road area, Wantage	Indicates that the Limborough Road area is proposed as the site for any major new shopping provision for Wantage. Requires a comprehensive approach to development or redevelopment, to include retail uses (subject to policy S1) and parking provision. Residential or B1 office uses will be allowed on upper floor levels	Fully Consistent	The majority of the site is now redeveloped. There is no need to retain or update this policy in the Part 2 plan as it will be protected by other relevant policies in the Local Plan 2031.	No
S10 Ock Street, Abingdon	Indicates that proposals which lead to environmental improvements within the Ock Street Policy Area will be permitted. Proposals which have a significant adverse effect on the character and appearance of the Ock Street approach to the town centre will be refused.	Fully Consistent	There is no longer a need to retain or update this policy as it is considered that sufficient detail is provided in Core Policies 37 and 38.	No
S11 Park Road, Faringdon	Indicates that proposals which lead to environmental improvements on the Park Road frontage by means of screening, landscaping or building design will be permitted. Proposals which have a significant adverse effect on the character and appearance of the	Fully Consistent	There is no longer a need to retain or update this policy as it is considered that sufficient detail is provided in Core Policies 37 and 38. This policy is also covered by the Faringdon Neighbourhood Plan which now forms part of the Development Plan.	No

	Park Road approach to the town centre will be refused.			
S12 Policies for local shopping centres	Indicates that, within the existing local shopping centres, changes of use from class A1 (retail) to classes A2 and A3 will only be permitted if certain criteria are met. Changes of use to residential (class C3) or office (class B1) uses will not be permitted at ground floor level. Such uses will be permitted on upper floors subject to certain criteria being met	Fully Consistent	Support for retail development in this area is already set out in Core Policy 32. Local Plan 2031 Part 2 needs to address the loss of/change of use from retail to other uses. Where possible, the policies can be merged for conciseness, whilst retaining separate sub-policies, where appropriate, to maintain flexibility and to apply certain criteria.	Yes. Combine into a single policy for the change of use of retail uses to other uses.
S13 Development of village shops	Indicates that proposals for the development or extension of village and other small shops designed to meet the day-to-day needs of the local population will be permitted provided they do not give rise to planning or highway problems	Fully Consistent	This policy is regularly used by the Development Management Team and needs retaining and/or updating in Local Plan 2031 Part 2. However, there is no need to have separate policies going forward.	Yes. Combine into one single policy on Village and Local Shops.
S14 Loss of village and other local shops	Indicates that proposals involving the loss of village and other local shops to other uses will not be permitted unless the Council is satisfied that there are other similar facilities of equivalent community benefit available in the area, and other specific criteria are met.	Fully Consistent	This policy is regularly used by the Development Management Team and needs replacing in Local Plan 2031 Part 2. However, there is no need to have separate policies going forward.	Yes. Combine into one single policy on Village and Local Shops.
S15 Garages and garage shops	Indicates that proposals for new service/petrol filling stations including those with ancillary shops will be permitted in the main settlements and villages provided certain criteria are met. Proposals for the extension of petrol filling stations or garage shops or the redevelopment of existing stations within the same use will be permitted provided that certain criteria are met	Fully Consistent	There is no longer a need to update this policy as garage and garage shops will be addressed in other development management policies in the Part 2 plan related to village and local shops and service stations.	No

APPENDIX 3: ASSESSMENT OF SAVED LOCAL PLAN 2011 TOURISM AND VISITOR ECONOMY POLICIES

<i>Policy</i>	<i>Summary of Saved Policy</i>	<i>Consistency with NPPF</i>	<i>Reasoning</i>	<i>Inclusion in Local Plan 2031 Part 2?</i>
T2: Tourist facilities on existing sites	Policy supports new associated tourist related development which serves the need of visitors to existing tourist sites where it complies with the general policies for development; and where the range, scale and nature of provision is limited to that commensurate with established visitor numbers to the tourist site concerned	Fully Consistent	There is no longer a need to retain or update this policy in the Part 2 plan as Core Policy 31 and Core Policy 29 in the Local Plan 2031 Part 1 provide sufficient level of detail.	No
T4: Camping and caravanning	Policy indicates that proposals for touring caravans and camping sites will be permitted provided that certain specific criteria are met. Criteria include that the site is not in the Green Belt, and that proposals are limited in scale in general not involving more than 10 caravans/camping pitches.	Fully Consistent	Proposals for touring caravans and camping sites will be covered by other development management policies related to rural diversification and countryside recreational facilities in the Part 2 plan.	Yes

APPENDIX 4: EMPLOYMENT POLICIES PROPOSED AT PREFERRED OPTIONS AND INCLUDED IN PUBLICATION PLAN

Preferred Options Policies	Publication Version Policies
Development Policy 9: Ancillary Uses on Key Employment Sites	Development Policy 10: Ancillary Uses on Employment Land
Development Policy 10: Community Employment Plans	Development Policy 11: Community Employment Plans
Development Policy 11: Rural Diversification and Equestrian Developments	Development Policy 12: Rural Diversification and Equestrian Developments

APPENDIX 5: RETAIL POLICIES PROPOSED AT PREFERRED OPTIONS AND INCLUDED IN PUBLICATION PLAN

Preferred Options Policies	Publication Version Policies
Development Policy 12: Change of uses of Retail Units	Development Policy 13: Change of use of Retail Units to Other Uses (<i>including sub-policies</i>)
Development Policy 13: Village and Local Shops	Development Policy 14: Village and Local Shops
Development Policy 14: Retail Parks	Development Policy 15: Retail Parks

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