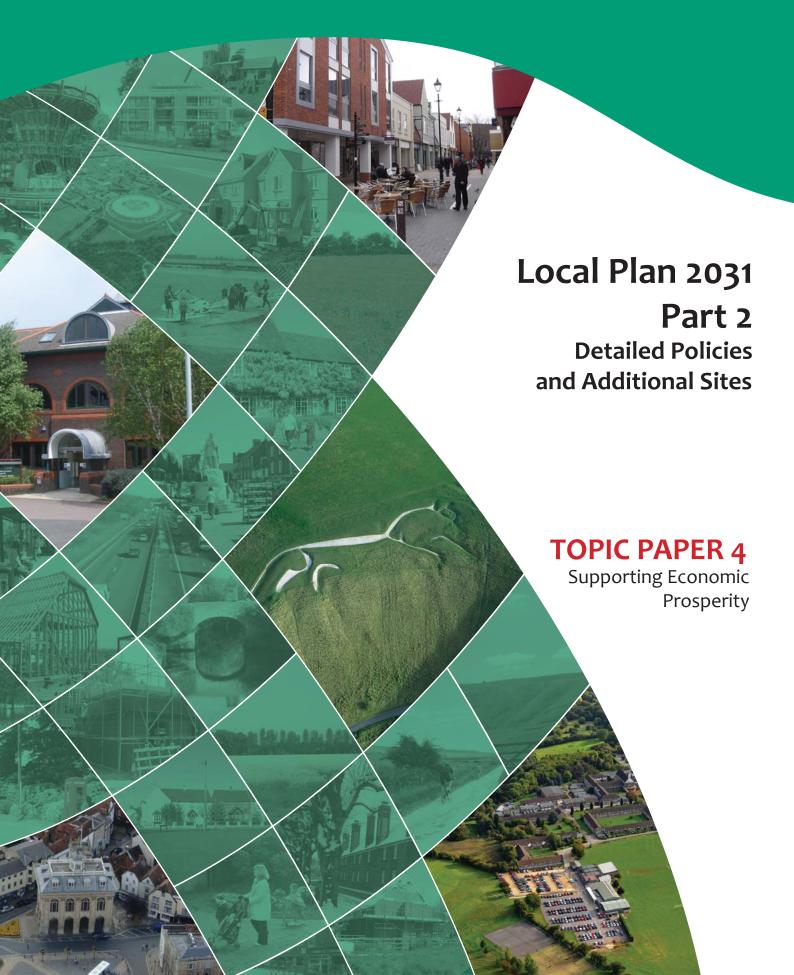


Consultation Draft March 2017



This paper is one of 6 topic papers, listed below, which form part of the evidence base in support of the draft Vale of White Horse Local Plan 2031 Part 2.

These topic papers have been produced to present a coordinated view 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 Topic papers will be revised following the 'preferred options' consultation to inform the next stage of plan preparation, which is known as the 'publication' stage. Final versions of the Topic Papers will be published alongside this final stage, which is timetabled for publication in the autumn of 2017

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. Housing and community facilities
- 4. Supporting economic prosperity
- 5. Transport and accessibility
- 6. Built, historic and natural environment

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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 (LPP2) in relation to 'Supporting Economic Prosperity'.
- 1.2 The Local Plan 2031 Part 2 will sit alongside the Local Plan 2031 Part 1 (LPP1) which was adopted in December 2016¹. Local Plan Part 1 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 Local Plan Part 2 will identify new site allocations to meet the Vale's apportionment of Oxford City's Unmet Need, any remaining development needs not accounted for in Local Plan Part 1, and includes policies in relation to Didcot Garden Town. It will also identify development management policies to assist in determining applications that relate to detailed planning matters not covered by LPP1.
- 1.4 This topic paper explains how the Council has considered and formulated the detailed development management policies, as set out in the Preferred Options Local Plan 2031 Part 2. It is one of a series of topic papers that reflect the four thematic areas central to the Local Plan 2031. 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 covers employment and retail.
- 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) and National Planning Practice Guidance (NPPG) and relevant legislation.
 - Local Policy Context: outlines relevant Core Policies in the Local Plan 2031 Part 1and provides a review and assessment of similarly relevant saved policies in the Local Plan 2011.
 - Evidence: summarises key evidence and its outcomes.

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

- **Informal Consultation Outcomes**: summarises key issues identified through informal consultation.
- **Key Issues:** summarises the key issues to be considered when formulating LPP2 policies.
- **Recommendations:** identifies the key recommendations for the policies that are included in the Preferred Options for Local Plan 2031 Part 2.

2.0 EMPLOYMENT

2.1 This section sets out the key issues to be taken into consideration when formulating the employment policies in Local Plan Part 2 including; ancillary uses, rural economy and equestrian activities.

National Policy Context

National Planning Policy Framework (NPPF)

- 2.2 The National Planning Policy Framework (NPPF), (paragraph 7), identifies 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'.
- 2.3 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 (paragraph 160). They should use their evidence base to assess the needs for employment land and floorspace and assess the existing supply of land (paragraph 161).
- 2.4 The NPPF, Section 1 sets out the Government's planning policies on 'building a strong and competitive economy'. It states (paragraph 21) 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.
- 2.5 The NPPF (paragraph 9) 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.
- 2.6 The NPPF also highlights the need to support a prosperous rural economy. It indicates that (at paragraph 28) 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.

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 guidance states that they should work with other local authorities in their functional economic market area in line with the 'duty-to-cooperate'. 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.
- 2.10 In Spring 2013, Government introduced a permitted development right that allows change of use from B1(a) offices to C3 residential², with the new right initially applying for a three year period. Local 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 development rights for Harwell Campus and Milton Park strategic employment sites.

Local Policy Context

Local Plan 2031 Part 1: Strategic Sites and Policies (LPP1), Adopted December 2016

2.11 LPP1 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 The Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2: Permitted Development Rights, available at: http://www.legislation.gov.uk/uksi/2015/596/schedule/2/made

- 2.12 The following LPP1 policies are of key relevance:
 - 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.
 - Core Policy 29: Change of use of Existing Employment Land and Premises sets the councils 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 In addition to the above, the supporting text to Core Policy 29 states the Saved Policy for Ancillary Uses E13, will need to be reviewed through the Local Plan 2031 Part 2 process, concluding that further detail may be required in an additional policy in LPP2.
 - 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 2009. Following the adoption of LPP1, a number of saved LP2011 policies were replaced however some saved policies have been carried forward.
- 2.15 The saved policies relating to employment that have been reviewed as part of this process, are as follows:
 - 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 ascertain if any of them should be included in Local Plan 2031 Part 2 or if they should no longer be replaced. **Appendix 1** shows the outcome of this process. In summary, 17 saved policies are carried into Local Plan 2031 Part 2 with 6 policies not being replaced.

Evidence

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

- 2.17 The addendum³ 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-E13 of the LP2011 should be carried forward and safeguarded for employment uses in the new 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.
- 2.18 The study recommends that a total of 219⁴ hectares of employment land is identified for development at new sites and saved Local Plan 2011 (LP2011) allocations, all identified within Core Policy 6. This includes the following sites:
 - Harwell Campus (saved LP2011 allocation)⁵: 94 ha
 - Milton Park (saved LP2011 allocation): 28 ha
 - Other saved LP2011 allocations: 13 ha
 - Didcot A Power Station: 29 ha
 - North Grove Monks Farm: 6 ha
 - Faringdon South Park Road: 3 ha
 - Milton Hill Business and Technology Centre: 11.2 ha
 - Harwell Campus (other land outside of the EZ): 35 ha
- 2.19 The study identifies that there is around 219 ha of vacant and developable employment land available in the district, including 122 ha at the Enterprise

³ URS (2014) Vale of White Horse Employment Land Review Addendum

⁴ Through the examination of Local Plan 2031 Part 1, this figure has since been corrected to 218 hectares

⁵ Through the examination of Local Plan 2031 Part 1, this figure has since been corrected to 93 hectares

Zone, 67 ha in potential future employment sites, and 30 ha in existing employment clusters. The report recommends that surplus employment land is protected for potential employment uses at the present time, until further information is gained, particularly relating to demand and site assessment of the Didcot A Power Station site. It is recommended that the bulk of this surplus should be apportioned to the Didcot A Power Station site.

- 2.20 The report identifies three employment sites in Faringdon and one site in Sutton Courtenay that are currently vacant and developable land but do not meet the criteria to satisfy the forecast demand up to 2031. These sites are as follows:
 - North of Pioneer Road, Faringdon
 - Strip of land alongside Park Road, Faringdon
 - Land south of the playground, Faringdon
 - Amey, Sutton Courtenav
- The report recommends that these sites are reviewed by the council and that they may be suitable for alternative uses. Further work would be required to ascertain whether these sites would be suitable for other uses. Since the completion of this work, the Faringdon Neighbourhood Plan has sought to retain some of the sites identified above to address the local need of the market town. The Amey site in Sutton Courtenay has received planning permission for redevelopment to housing⁶.

Oxfordshire Local Enterprise Partnership (LEP) - Community Employment Plans

- 2.22 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 report 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.
- 2.23 The draft report suggests that initiatives, such as Community Employment Plans can help to tackle social deprivation, which currently exists in Oxfordshire and creating more employment opportunities for local communities. This will assist in delivering a number of actions addressed in the Strategic Economic Plan⁷, including the alignment of skills provision and addressing exclusion from the labour market.

Informal Consultation Outcomes

The Planning Policy Team has undertaken a stage of informal consultation with other teams in the Council including the Economic Development team

⁶ See planning application reference P10/V1907/O

⁷ Oxfordshire Local Enterprise Partnership (LEP) (2014) Strategic Economic Plan; available at:

and key external bodies. The informal consultation responses received have identified a number of issues that have helped inform policy development to date of Local Plan Part 2. Key comments are as follows:

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

Key Issues

- 2.25 The key issues to be considered when preparing LPP2 policies, reflecting the above, are:
 - The need for further policies on specific employment sites to supplement policies in LPP1.
 - The need to consider a policy to support opportunities for local employment.
 - 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 informal consultation are supportive of providing a more detailed policy on ancillary uses.
 - National policy and the nature of the district reflect a need for a policy on supporting a prosperous rural economy in the district. This includes the provision of farms shops and the keeping, rearing and breeding of horses exists in the district both on a commercial and private basis.
 - Limited development has taken place at Steventon Storage Facility and current Saved Policy appears non- compliant with the NPPF.

Recommendations

- 2.26 The recommendations in respect of employment policies for consideration in LPP2 are as follows:
 - A policy or policies should be considered in relation to ancillary uses to provide further direction on where non B-use class would be appropriate. Any policy needs to link to Core Policy 29 and some flexibility regarding uses that are compliant with an adopted Supplementary Planning Document or Local Development Order for that particular site;
 - A policy or policies should be considered that seek to clearly support a
 prosperous rural economy. Policy should cover and encourage the
 economic growth of different types of rural businesses. It should also
 incorporate specific policy criteria in relation to new equestrian
 developments.
 - A policy should be considered in relation to supporting proposals that create opportunities for local employment and the development of local skills and expertise.
 - 4. Saved Policies related to specific sites, including E1, E2, E3 and E4 should no longer be considered as part of these policies are sufficiently covered by Core Policy 6 and site specific requirements are covered by other relevant Local Plan 2031 Part 1 policies.
 - Policies related to local rural sites, rural multi-user sites and large campus style sites should no longer be considered as Core Policy 29 in the Local Plan 2031 Part 1 provides sufficient level of detail to determine this type of proposal.
 - 6. A policy should no longer be considered to support the proposals for new development for agricultural purposes 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.

3.0 RETAIL AND TOWN CENTRES

3.1 This section sets out the key issues to be taken into consideration when formulating the retail policies in Local Plan Part 2 including; shopping frontages and village and local shops.

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 (paragraph 17).
- 3.3 The NPPF (paragraph 23) indicates 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.
 - 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.
- Where town centres are in decline, Local Planning Authorities should plan positively for their future to encourage economic activity'.
- 3.4 The NPPF also identifies (paragraph 26) that when assessing proposals for retail, leisure and office development outside of town centres, that are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. It notes that if there is no locally set threshold, the default floorspace threshold is 2,500sq.m.
- 3.5 The NPPF also supports a prosperous rural economy. It indicates (paragraph 28) 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.
 - Promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

(selected bullet points only)

- 3.6 The NPPF includes guidance as to the use of a proportionate evidence base to support local plans. It states (paragraph 160) that 'Local Planning Authorities should have a clear understanding of business needs within the economic markets operating in and across their area' and that this should be achieved through joint working with neighbouring authorities and Local Enterprise Partnerships, and through working closely with the business community.
- 3.7 It also indicates (paragraph 161) 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

locations of deprivation which may benefit from planned remedial action

Planning Practice Guidance (PPG) and Other Legislation and Guidance

- 3.8 Planning Practice Guidance 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 review⁸. Indicators that should be used to determine the health of town centres include the following⁹:
 - 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
- 3.9 The PPG provides further guidance on the process required where development cannot be accommodated in the town centre. Where this is the case, it suggests that planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests 10. The PPG also provides detail on the sequential approach and the impact test in addressing new retail and other town centre use developments.

Assessing economic development and main town centre uses

- 3.10 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

⁸ Paragraph: 004 Reference ID: 2b-004-20140306

⁹ Paragraph: 005 Reference ID: 2b-005-20140306

¹⁰ Paragraph: 006 Reference ID: 2b-006-20140306

- 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

- 3.11 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. 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 societies¹¹.
- 3.12 As part of the consultation document informing 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 (LPP1), Adopted December 2016

- 3.13 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.
- 3.14 The following LPP1 policies are particularly relevant:
 - 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

¹¹ The Town and Country Planning (General Permitted Development) (England) Order 2015; Part 3 Changes of Use, available at: http://www.legislation.gov.uk/uksi/2015/596/schedule/2/part/3/made

and Smaller Villages where it meets the needs of the local community.

3.15 The policy approach of LPP1 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 period¹². This includes defining the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres and; allocating suitable sites for retail and other main town centre uses.

Saved Policies in Local Plan 2011

- 3.16 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 LPP1, a number of saved LP2011 policies were replaced, however some saved policies have been carried forward.
- 3.17 The saved policies relating to retail that have been reviewed as part of this process, are as follows:
 - 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
- 3.18 An assessment of these saved policies has been undertaken to ascertain if any of them should be included in Local Plan 2031 Part 2 or if they should no longer be replaced. Appendix 2 shows the outcome of this process. In summary, 8 of the 12 saved policies are carried forward into LPP2 with 4 saved policies no longer being replaced.

¹² National Planning Policy Framework (NPPF), paragraph 23

Evidence

Retail and Town Centres Study Update 2016

- 3.19 An update to the Retail and Town Centres Study 2013 was undertaken in 2016 by Nathaniel Lichfield and Partners¹³. 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 LPP2.
- 3.20 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 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 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%.
 - In Faringdon town centre the proportion of Class A uses is 56.8%
- 3.21 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.
 - 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.
- 3.22 The following changes are suggested to the district's primary and secondary shopping frontages:
 - The following units could be designated as secondary frontage to protect the existing Class A uses and to maintain footfall between the Coexter House and the rest of the town centre:
 - Numbers 1 and 2 The Square (Barclays and Ask Restaurant);

¹³ Nathaniel Litchfield and Partners (NLP) (2016) Retail and Town Centres Study Update, available at: www.whitehorsedc.gov.uk/LPP2

- Numbers 2 to 8 (even) Ock Street (including Lloyds bank); and
- Numbers 5 to 15 (odd) Ock Street).
- 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.
- Consider designating Arbery Arcade as secondary shopping frontage in order to protect the Class A uses.
- 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.
- 3.23 These changes will be incorporated into the Adopted Policies Maps.

Informal Consultation Outcomes

- 3.24 The Planning Policy Team has undertaken a stage of informal consultation with other teams in the Council including the Economic Development team and key external bodies. The informal consultation responses received have identified a number of issues that have helped inform policy development to date of Local Plan Part 2. Key comments are as follows:
 - Economic Development Team: commented that a policy/supporting text for ancillary uses on employment sites should make clear the economic benefits of locating hotels/conference centres close to business uses.
 - Development Management Team: commented that Saved Policy E13 is effective and frequently applied in setting out criteria to guide proposals for uses other than business uses on key employment sites
 - Development Management Team: commented that an additional policy on retail parks should be included in LPP2 to restrict uses to bulky goods retail uses at Fairacres Retail Park, Abingdon and Seacourt Tower Business Park, Botley.
 - Development Management Team: commented that existing saved policies on shopping frontages are useful. Supporting text should include the level of information required to support an application involving the change of use from retail to other uses.

Key Issues

- 3.25 The key issues to be considered when preparing LPP2 policies, reflecting the above, are:
 - The key challenge set out in the Local Plan 2031 Part 1, to build a strong and competitive economy, to ensure vitality of town centres and to support a prosperous rural economy.

- National policy, which 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, which also highlights the importance of including policies that make clear which uses will be permitted in locations.
- Local evidence, which has provided justification for reviewing primary and secondary shopping frontages at Abingdon and Wantage.
- Consultation has highlighted the importance of restricting uses to bulky goods retail uses at Fairacres Retail Park, Abingdon and Seacourt Tower, Botley.
- Scoping of the saved policies, which has highlighted the importance of addressing the loss and/or change of use from retail units to other uses.

Recommendations

- 3.26 The recommendations in respect of retail policies for consideration in LPP2 are as follows.
 - 1. Saved policies S2, S3, S4, S5, S6 and S12 should be combined into a single policy in the Part 2 Plan, which would address the change of use and loss of retail to other uses.
 - Saved policies S13 and S14 should be 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.
 - 3. Saved policy S8 The Limborough Road area at Wantage is no longer needed and should not be brought forward into LPP2.
 - 4. Saved policy S10 Ock Street at Abingdon is no longer replaced in the Part 2 Plan as Core Policies 37 and 38 in the Local Plan 2031 Part 1 provide sufficient level of detail
 - 5. Saved policy S11 Park Road at Faringdon is no longer needed and should not be brought forward into LPP2, as this is superseded by the adopted Faringdon Neighbourhood Plan.
 - 6. Saved policy S15 Garage and Garage Shops is no longer needed and should not be brought forward into LPP2, as it will be covered by other Development Management Policies.
 - An additional policy should be considered that covers retail parks, with a particular focus on Fairacres at Abingdon and Seacourt Tower at Botley.
 - 8. No further policies are needed in LPP2 in relation to Abbey Shopping Centre and the Charter, Abingdon or the Botley Central Area, Botley as Core Policies 10 and 11 in the Local Plan 2031 Part 1 provide sufficient level of detail.

4.0 VISITOR ECONOMY

National Policy Context

National Planning Policy Framework (NPPF)

- 4.1 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 centres (paragraph 23) and support sustainable rural tourism and leisure developments that benefit businesses, communities and visitors, whilst respecting the character of the countryside (paragraph 28).
- 4.2 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)

- 4.3 The Planning Practice Guidance (PPG) provides additional guidance on tourism and the visitor economy. In particular, it suggests that local planning authorities, should articulate a vision for tourism in the Local Plan, including identifying key locations for tourism. When planning for tourism, local planning authorities should¹⁴:
 - Consider the specific needs of the tourist industry, including particular locational or operational requirements;
 - Engage with representatives of the tourism industry;
 - 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.

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¹⁴ Paragraph: 007 Reference ID: 2b-007-20140306

Local Policy Context

Local Plan 2031 Part 1: Strategic Sites and Policies (LPP1), Adopted December 2016

- 4.4 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.
- 4.5 The following Part 1 Plan policies are particularly relevant:
 - 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

- 4.6 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 LPP1, a number of saved LP2011 policies were replaced, however some saved policies have been carried forward.
- 4.7 The saved policies related to tourism and the visitor economy that have been reviewed as part of this process, are as follows:
 - T2 Tourist facilities on existing sites
 - T4 Camping and caravanning
- 4.8 An assessment of these saved policies has been undertaken to ascertain if any of them should be included in Local Plan 2031 Part 2 or if they should no longer be replaced. Appendix 3 shows the outcome of this process. In summary, 1 of the 2 saved policies are carried forward into LPP2 with 1 saved policies no longer being replaced.

Evidence

Hotels Needs Assessment (2014)

4.9 A Hotels Needs Assessment (2014) was carried out for South Oxfordshire and Vale of White Horse by Hotel Solutions¹⁵. The report has informed the development of Core Policy 31 in the adopted Local Plan 2031 Part 1, in

¹⁵ Hotel Solutions (2014) South Oxfordshire and Vale of White Horse Hotel Needs Assessment

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.

Informal Consultation Outcomes

- 4.10 The Planning Policy Team has undertaken a stage of informal consultation with other teams in the Council including the Economic Development team and key external bodies. The informal consultation responses received have identified a number of issues that have helped inform policy development to date of Local Plan Part 2. Key comments are as follows:
 - Development Management Team: commented that the existing saved policy T4 related to camping and caravanning sites is useful and should be updated in LPP2.
 - 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.

Key Issues

- 4.11 The key issues to be considered when preparing LPP2 policies related to tourism and visitor economy are:
 - Diversification in the types of caravanning and camping facilities that are available. For example, facilities are being developed across the country for more bespoke activities such as glamping (luxury camping), shepherds' huts, yurts, and wild camping. Applications for all these types of facilities in the Vale may need to be considered in planning policy.
 - Policies related to tourism and the visitor economy in LPP2 may duplicate requirements set out in Core Policy 31 of the Local Plan 2031 Part 1.
 - LPP2 should consider supporting proposals for small-scale recreational facilities related to tourism and leisure development in the open countryside.

Recommendations

- 4.12 The recommendations in respect of tourism and visitor economy policies for consideration in LPP2 are as follows:
 - 1. A policy to support proposals for rural diversification and equestrian developments should be considered.
 - Saved policy T4 in the Local Plan 2011 should be retained and integrated into a policy in the Part 2 Plan to support small-scale recreational facilities in the open countryside. This is now covered in the Leisure section of the Protecting the Environment and Responding to Climate Change Chapter.
 - 3. Saved policy T2 in the Local Plan 2011 is no longer needed and should not be brought forward into LPP2 as Core Policies 29 and 31 in the Part 1 Plan provide sufficient level of detail.

APPENDIX 1: ASSESSMENT OF SAVED LOCAL PLAN 2011 EMPLOYMENT POLICIES

Policy	Summary of Saved Policy	Consistency with NPPF	Reasoning	Inclusion in Local Plan 2031 Part 2?
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	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	active. Site specific requirements are also covered by other LPP1 policies.	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 LPP1 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 LPP1 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	LPP2 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 LPP2 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
			Development management Team.	

Policy	Summary of Saved Policy	Consistency with NPPF	Reasoning	Inclusion in Local Plan 2031 Part 2?
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	Yes. Combine into a single policy on rural
E19 Farm shops		Fully Consistent	sustainable growth and expansion of business and enterprise in rural areas in line	diversification and equestrian development
E20 The keeping, rearing and training of horses	Policies enable appropriate development for keeping, rearing	Fully Consistent	with the NPPF including the development and diversification of agricultural and other	
E21 Loss of facilities for the keeping, rearing and training of horses	and training of horses and protection of loss.	Fully Consistent	land-based rural businesses. However, there is no need to have separate policies going forward.	

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. However, there is no need to have separate policies going forward.	Yes. Combine into a single policy for the change of use of retail uses to other uses.
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. However, there is no need to have separate policies going forward.	Yes. Combine into a single policy for the change of use of retail uses to other uses.
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. However, there is no need to have separate policies going forward.	Yes. Combine into a single policy for the change of use of retail uses to other uses.
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. 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	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. However, there is no need to have separate policies going forward.	Yes. Combine into a single policy for the change of use of retail uses to other uses.

S6 Upper floors in Town Centres	will be permitted on upper floors subject to there being no demonstrable harm to the living conditions of any neighbouring residents. Indicates that new shopping and commercial development within the town centres shall, where possible, incorporate specific provision to	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 Policy 29 of the Local Plan 2031 Part 1 and the emerging	No
S8 The Limborough Road area, Wantage	maintain or improve the means of access to upper floors. 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	Fully Consistent	policy related to retail in the Local Plan 2031 Part 2. 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	redevelopment, to include retail uses (subject to policy S1) and parking provision. Residential or B1 office uses will be allowed on upper floor levels Indicates that proposals which lead to environmental improvements within the Ock Street Policy Area will be permitted.	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	Proposals which have a significant adverse effect on the character and appearance of the Ock Street approach to the town centre will be refused. Indicates that proposals which lead to environmental improvements on the Park Road frontage by means of screening, landscaping or building	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
	design will be permitted. Proposals which have a significant adverse effect on the character and appearance of the Park Road approach to the town centre will be refused.		This policy is also covered by the Faringdon Neighbourhood Plan which now forms part of the Development Plan.	

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. However, there is no need to have separate policies going forward.	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-today 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

Policy	Summary of Saved Policy	Consistency with NPPF	Reasoning	Inclusion in Local Plan 2031 Part 2?
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	There is no longer a need to retain or update this policy in the Part 2 Plan, however proposals for touring caravans and camping sites will be covered by other development management policies related to rural diversification and countryside recreational facilities.	No

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