

Vale of White Horse Local Plan 2031 Part 1

Examination Hearings

Examination Stage 2

Written Statement by Vale of White Horse District Council

in relation to:

Matter 12 – District-Wide Policies (Policies CP1, CP22 - CP32 and CP37 – CP46)

Version:	Final
Dated:	06 January 2015

Matter 12 - Matter 12 – District-Wide Policies (Policies CP1, CP22 - CP32 and CP37 – CP46)

1. Introduction and Background

- 1.1 The Local Plan 2031 Part 1 has a key role in helping to build sustainable communities in the Vale and helping to meet the diverse needs of the people living there. The policies being considered in Matter 12 are necessary to complement the spatial strategy and ensure that growth is sustainable by addressing local housing needs, supporting economic growth, protecting the Vale's high quality natural and built environment, and delivering high quality development.
- 1.2 The majority of the policies for this matter have been developed where national guidance alone is not sufficient to deliver the Council's vision. They build on, rather than duplicate, national guidance.
- 1.3 In considering this Matter, the Inspector may particularly wish to refer to the following documents:
- Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04; DLP04.1)
 - Topic Paper 4: Housing (TOP04)
 - Oxfordshire Strategic Housing Market Assessment (HOU01)
 - Topic Paper 5: Supporting Economic Prosperity (TOP05)
 - Employment Land Review 2013 Update (ECO01, ECO01.1)
 - Employment Land Review Addendum (ECO01.2)
 - Economic Forecasting to inform the Oxfordshire SEP and SHMA (ECO02)
 - South Oxfordshire and Vale of White Horse District Council Joint Hotel Needs Assessment (ECO08)
 - Topic Paper 8: The Built and Historic Environment (TOP08)
 - Topic Paper 9: The Natural Environment (TOP09)
 - Vale of White Horse District Council Design Guide SPD 2015 (BHE05)
 - Strategic Flood Risk Assessment (WWF03)
 - Water Cycle Study – Updated Phase 1 Study (WWF01.1)
 - Oxfordshire Historic Landscape Characterisation Project (BHE01)
 - Statement of Common Ground with the Environment Agency and Thames Water (SCG08)
- 1.4 The outcome of public consultation on the Local Plan has also shaped the policies in the matter. The key issues raised through consultation

are detailed in the Regulation 22 Statement¹, Appendix 3² and the Supplement to the Regulations 22 Statement³.

Question 12.1

Are the policies relating to the presumption in favour of sustainable development and building healthy and sustainable communities soundly based?

- (a) Presumption in favour of Sustainable Development (CP1)**
- (b) Housing Mix (CP22)**
- (c) Housing Density (CP23)**
- (d) Affordable Housing (CP24)**
- (e) Rural Exception Sites (CP25)**
- (f) Accommodating Current and Future Needs of the Ageing Population (CP26)**

2. The Council's Response to Question 12.1

Presumption in favour of Sustainable Development (CP1)

- 2.1 The Local Plan is consistent with the NPPF's positive approach to achieving sustainable growth. Policies in the Local Plan are positively worded to accommodate development. This approach is confirmed by Policy CP1 and makes clear the Local Plan's presumption in favour of sustainable development.

Housing Policies - Introduction

- 2.2 The Council considers that housing policies CP22-CP26 are soundly based for the following reasons:

Housing Mix (CP22)

Positively Prepared

- 2.3 This policy provides a strategy for the consideration of housing mix. The policy is based on a robust assessment of housing mix needs in the district, identified by the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA)⁴. The SHMA uses a demographic driven approach to its methodology⁵ and identifies a range of different needs for new housing being planned across the district, including for example differences between the age of households that occupy

¹ Regulation 22 Statement (DLP09)

² Regulation 22 Statement Appendix 3 (DLP09.2)

³ Supplement to the Regulation 22 Statement – Council Response to Summarised Representations (PSD01)

⁴ Oxfordshire Strategic Housing Market Assessment (HOU01) Section 7, page 127

⁵ Oxfordshire Strategic Housing Market Assessment (HOU01) Figure 58, page 128

market and affordable homes. The policy therefore requires a mix of housing types within new developments. The council and developers should refer to the SHMA to help determine what the mix should be on a site by site basis. The Policy is drafted to allow flexibility rather than closely prescribe a housing mix for individual sites.

Justified

- 2.4 The SHMA concludes that there is a need to reinforce the requirement to provide a balanced profile of market homes of different sizes, including smaller homes for younger households and those looking to downsize; as well as larger family homes. For affordable need, there is a shift towards a greater need for smaller homes as well as a requirement for larger homes⁶. When applying the policy, the housing mix identified in the most up-to-date SHMA will be used by the Council, to guide proposed development. The policy also provides flexibility to enable specific development schemes to deliver an alternative mix based on evidence from households currently on the Housing Register in the local area.
- 2.5 The Sustainability Appraisal⁷ tested two options for CP22. A hybrid option has been taken forward providing the most appropriate, justified policy. This option provides the Council with some control over the mix of housing sizes to be delivered in accordance with the assessed need in the SHMA and provides for flexibility of local circumstances and viability respectively.

Effective

- 2.6 The identified mix is used within the policy to guide development whilst also providing flexibility to enable development schemes to provide an alternative mix based on evidence from households currently on the Housing Register in the local area. This ensures the policy is effective in delivering an appropriate mix that accords with the latest housing needs assessment unless robust evidence on the housing need of a specific settlement or viability constraints demonstrates otherwise.

Consistency with National Policy

- 2.7 CP22 is consistent with the NPPF, because it will help to deliver a wide choice of high quality homes. The policy ensures that the needs of current and future households are provided for balancing the housing stock in the district and HMA⁸. This is in accordance with the national guidance⁹.

Issues Raised

- 2.8 The Council has reviewed and considered the representations¹⁰ that have been received on this policy. The main issue raised is that the

⁶ Oxfordshire Strategic Housing Market Assessment (HOU01) page 136-137

⁷ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 18 page 109-110

⁸ CLG (2012) National Planning Policy Framework, paragraphs 50, 159

⁹ National Planning Practice Guidance (Ref 2a-021-20150326).

¹⁰ Supplement to the Regulation 22 Statement (PSD01)

policy may be overly prescriptive. The Council does not agree and considers the policy provides sufficient flexibility to enable each scheme to be assessed on its own merits, taking account of the latest housing mix information available at the time.

Housing Density (CP23)

Positively Prepared

- 2.9 The policy will enable appropriate site densities to be delivered reflecting local circumstances. It balances the need to ensure land is efficiently used as well as enabling schemes where a lower density may be more appropriate or in keeping with local character, recognising that large parts of the district have a rural character.

Justified

- 2.10 The Sustainability Appraisal¹¹ tested three options with the preferred option being assessed as providing the most positive outcomes.

Effective

- 2.11 The policy provides a balance between ensuring land is efficiently used and is responsive to local character. This flexibility will ensure the effectiveness of the policy by supporting a design-led approach to guide density on a site by site basis.

Consistent with National Policy

- 2.12 The policy is consistent with the NPPF by setting out an approach to densities that is based on, and provides flexibility for, local circumstances as well as maximising the efficient use of land¹².

Issues Raised

- 2.13 Few representations were received in respect to this policy¹³. The main concern reflected whether there should be a minimum density requirement. The Council considers that by providing a minimum density, land is efficiently used. The policy is sufficiently flexible to respond to schemes where differing densities may be appropriate.

Affordable Housing (CP24)

Positively Prepared

- 2.14 The policy addresses the affordable housing needs of the district identified by the SHMA¹⁴ and takes account of viability as set out within the Local Plan Viability Study. This was discussed in part through the stage one hearings¹⁵.

¹¹ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 17 page 108

¹² CLG (2012) National Planning Policy Framework, paragraphs 47

¹³ Supplement to the Regulation 22 Statement (PSD01)

¹⁴ Oxfordshire Strategic Housing Market Assessment (HOU01) Section 6, page 103

¹⁵ Please see the Council's response to Matter 2

Justified

- 2.15 The SHMA demonstrates that the housing requirement of 1,028 dwellings per annum would sufficiently meet the affordable needs of the district¹⁶. The 2012 based Housing Projections on Housing Needs demonstrate a target of 35% will ensure affordable housing needs can be met in full¹⁷. The Viability Study also supports a 35% target¹⁸. The study assures us that infrastructure can still be delivered alongside the planned growth, including affordable housing.
- 2.16 The Sustainability Appraisal assessed options for both the affordable housing target and threshold with the preferred options providing the most significant positive impacts as reflected in CP24¹⁹.

Effective

- 2.17 As set out above, CP24 can be implemented effectively without undermining the ability for sites to deliver a balance of market and affordable homes, as well as key infrastructure. It also allows flexibility to reduce requirements for less viable developments, if supported by a robust viability assessment.

Consistent with National Policy

- 2.18 The Policy is consistent with the NPPF, ensuring the full objectively assessed affordable housing needs are met providing a reasonable target and threshold²⁰. The Viability Study has been undertaken in accordance with the NPPF in particular paragraphs 173, 174 and 177²¹.
- 2.19 Since the publication version of the Local Plan (November 2014), guidance on affordable housing thresholds as set out within the PPG remains under consideration. The Council proposed to modify the policy to reflect guidance as at March 2015²², but now wish to withdraw/delete this proposed modification. To clarify, the Council seeks thresholds for affordable housing being sought on all sites capable of a net gain of three or more dwellings, on sites of at least 0.1 hectares.

Issues Raised

- 2.20 The Council has reviewed the representations²³ to this policy. These mainly focused on the target with some concerns that the target is both too high and too low. The Council considers the 35% affordable housing target will ensure needs are met whilst ensuring development is viable.

¹⁶ Oxfordshire Strategic Housing Market Assessment (HOU01) Table 90 page 181

¹⁷ Implication of the 2012 based Housing Projections on Housing Needs (HOU10)

¹⁸ Local Plan Viability Study (INF01) section 10.36-37, page 118

¹⁹ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 16, page 106-107

²⁰ CLG (2012) National Planning Policy Framework, paragraphs 47, 50 and 159

²¹ National Planning Practice Guidance (Ref 2a-029-20140306).

²² Schedule of Proposed Changes A (DLP12) Proposed minor modification 6.2

²³ Supplement to the Regulation 22 Statement (PSD01)

Rural Exception Sites (CP25)

Positively Prepared

- 2.21 The policy promotes sustainable, inclusive and mixed communities in the rural area through enabling the delivery of affordable housing to meet identified needs in the rural areas.

Justified

- 2.22 The policy ensures affordable housing to meet local needs can be provided in rural areas where suitable sites are not available in accordance with the Settlement Hierarchy. The Council considers there are no other reasonable alternatives to deliver affordable rural housing to meet local needs in accordance with national policy and that this policy approach is fully justified.

Effective

- 2.23 The policy sets out criteria to which applications for exception sites are proposed, including providing clarity where viability issues occur.

Consistent with National Policy

- 2.24 The policy is consistent with the NPPF²⁴ and the PPG, recognising there are issues facing rural areas in terms of affordability. The policy contains clear and precise criteria as well as providing flexibility that is consistent with national policy.

Issues Raised

- 2.25 Few representations were received in respect to this policy²⁵. Historic England provided suggested improvements to the wording. The Council agrees that Historic England's suggestions provide improved clarity and they form part of the Schedule of Minor Changes²⁶.

Accommodating Current and Future Needs of the Ageing Population (CP26)

Positively Prepared

- 2.26 The policy positively responds to the assessment of the housing needs of the district that demonstrates the older population of Oxfordshire is projected to increase significantly up to 2031. The policy requires all strategic site allocations to provide homes designed for the older population, to help meet this need. The policy requires new development to provide for the future needs of older people both as part of general housing or as housing specifically designed as suitable for older people.

²⁴ CLG (2012) National Planning Policy Framework, paragraphs 54-55

²⁵ Supplement to the Regulation 22 Statement (PSD01)

²⁶ Schedule of Proposed Minor Changes (DLP11) Mod 6.3, page 12

Justified

- 2.27 The SHMA demonstrates the need for additional households to serve older people for the plan period²⁷. The Sustainability Appraisal assessed a number of options²⁸ with the preferred option providing the most positive outcomes.

Effective

- 2.28 The policy will deliver an increase in the supply of more flexible and adaptable housing that is of benefit to the health and well-being of Vale residents. By requiring all new homes for older people to be built to Lifetime Homes Standards, it ensures that older people's homes are adaptable and enable people to stay in their own home if their needs change.

Consistency with National Policy

- 2.29 The policy is consistent with the NPPF, in particular paragraph 50, ensuring the needs of different communities are met. More specifically the policy is in accordance with the PPG as it provides for the future needs of older people both as part of general housing or as housing specifically designed as suitable for older people²⁹.

Issues Raised

- 2.30 The Council has reviewed and considered the representations³⁰ made on this policy. Few representations were received and most supported the principle of the policy although some concerns were raised as to whether it will deliver sufficient housing for the older population, and of the right type. Applied robustly, the Council considers the policy will ensure that both the volume of need and standard of accommodation for older persons will be fully provided.

Question 12.2

Are the policies relating to supporting economic prosperity soundly based?

- (a) New Employment Development on Unallocated Sites (CP28)**
- (b) Change of Use of Existing Employment Land and Premises (CP29)**
- (c) Further and Higher Education (CP30)**
- (d) Development to Support the Visitor Economy (CP31)**
- (e) Retail Development and other Main Town Centre Uses (CP32)**

²⁷ Oxfordshire Strategic Housing Market Assessment (HOU01) page 139-149

²⁸ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 18, page 109-110

²⁹ National Planning Practice Guidance (Ref 2a-021-20150326)

³⁰ Supplement to the Regulation 22 Statement (PSD01)

3. The Council's Response to Question 12.2

Introduction

- 3.1 The Council considers that the five policies as set out in this question are soundly based for the following reasons:

New Employment Development on Unallocated Sites (CP28)

Positively Prepared

- 3.2 Policy CP28 complements CP6. It allows flexibility for additional development to come forward across the district, and supports development of the rural economy.

Justified

- 3.3 The Sustainability Appraisal tested three spatial options for unallocated sites in built areas, as well as three options specifically for rural development³¹. The appraisal recognises that the Council's preferred approach provides flexibility for such development to come forward across the district³². It notes that this approach can have implications for the environment. Separate environmental policies (see Matter 12.3) are considered to sufficiently mitigate these concerns.

Effective

- 3.4 The policy encourages flexibility and ensures the Plan can deliver economic growth up to 2031. It sets out criteria, three for built areas, and two for proposals in more rural locations. Any such applications will need to be assessed against these criteria.

Consistent with national policy

- 3.5 The policy aligns itself to the guidance set out in the NPPF. It accommodates needs not anticipated in the Plan and allows a rapid response to changes in economic circumstances. Through supporting appropriate B-Class employment development on unallocated sites across the district, subject to specific criteria, the policy addresses potential barriers to investment³³. The policy is intended to play a significant role in supporting a prosperous rural economy, as set out in paragraph 28 of the NPPF.

Issues Raised

- 3.6 No significant issues were raised to this policy. The Council however requests a minor modification to the policy to add clarity. This is set out in **Appendix 1** of this statement.

³¹ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 24, page 120-122

³² SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 24, page 122

³³ CLG (2012) National Planning Policy Framework, paragraph 21

Change of Use of Existing Employment Land and Premises (CP29)

Positively prepared

- 3.7 Policy CP29 supports, through a set of criteria, where alternative uses may be considered acceptable on employment sites, both strategic and non-strategic.

Justified

- 3.8 The Sustainability Appraisal tested four options for this policy³⁴. The appraisal notes that all options scored positively for most, if not all objectives, with no major negative effects³⁵. The Council's approach implements criteria to allow flexibility to reflect particular circumstances of sites. The conclusions made in the Employment Land Review Update 2013³⁶ recommend all employment land should be protected where possible.

Effective

- 3.9 The policy sets out criteria that allows, in certain situations, for change of use of employment land to be permissible. The policy limits the acceptable alternative uses on safeguarded sites, but is more permissible for those that have not been safeguarded.

Consistent with national policy

- 3.10 Policy CP29 avoids the long-term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose³⁷. The local plan and its supporting evidence will be monitored upon adoption and allocations will be regularly reviewed.

Issues Raised

- 3.11 Few representations were received with respect to this policy³⁸. Some representations considered the policy to be too restrictive. The Council disagrees. Evidence supports the safeguarding of sites, while only one of the four criteria needs to be met in circumstances where a change of use on a non-safeguarded site is proposed.

Further and Higher Education (CP30)

Positively prepared

- 3.12 Policy CP30 supports improvements to further and higher education facilities to help ensure local people have opportunities to gain the skills needed to access the jobs available and contribute to a suitably skilled local labour force.

³⁴ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 25 page 123

³⁵ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 25.3.2

³⁶ Employment Land Review 2013 Update (ECO01) Recommendation R1 p77

³⁷ CLG (2012) National Planning Policy Framework, paragraph 22

³⁸ Supplement to the Regulation 22 Statement (PSD01)

Justified

- 3.13 Policy CP30 is supported by key strategic documents, such as the Oxfordshire Skills Strategy to 2020 and the Strategic Economic Plan. Those documents reference the Oxfordshire Knowledge Spine, Oxford Brookes University as a top performing new university and the Defence Academy at Shrivenham, which provides post-graduate education to the tri-services.

Effective

- 3.14 The policy supports development and enhancement of further and higher education facilities at suitable locations in the district, including: at existing education/suitable community facilities; at employment locations provided the training offered is relevant to businesses located there; and in the main settlements and other locations with high quality sustainable transport links. The policy is therefore intended to enable key further and higher education establishments in the district to grow, in a sustainable manner.

Consistent with national policy

- 3.15 The NPPF states that planning policies should aim for a balance of land uses within their areas to minimise journey lengths for employment, leisure, education and other activities³⁹. It also seeks to take a proactive, positive and collaborative approach to development that will widen choice in education⁴⁰. The policy is considered to accord closely with this advice.

Key issues

- 3.16 Few representations were received with respect to this policy⁴¹. None raised objection to the principle of the policy.

Development to Support the Visitor Economy (CP31)

Positively prepared

- 3.17 Policy CP31 responds proactively to the need to develop certain facilities that are necessary to help deliver the identified visitor economy needs of the district up to 2031, through a broad locational strategy.

Justified

- 3.18 Predicted growth in the visitor economy and in the need for local visitor accommodation is set out in the Joint Hotel Needs Assessment⁴². A significant increase in corporate demand for hotel accommodation is expected in Science Vale. It recognises that there is a shortfall of hotels to adequately meet current demand in this area. The policy seeks to provide a positive framework to respond to those needs.

³⁹ CLG (2012) National Planning Policy Framework, paragraph 37

⁴⁰ CLG (2012) National Planning Policy Framework, paragraph 72

⁴¹ Supplement to the Regulation 22 Statement (PSD01)

⁴² Joint Hotel Needs Assessment (ECO08) section 5.5.1 p.50

- 3.19 The Sustainability Appraisal tested two options and the Council's preferred approach reflects the findings of the SA⁴³. It notes that this approach can have implications for the environment through increasing the numbers of visitors travelling to rural areas. Separate environmental policies (see Matter 12.3) are considered to sufficiently mitigate these concerns.

Effective

- 3.20 Policy CP31 sets out criteria for new development as well as what uses are considered suitable at various locations in the district, including in rural areas.

Consistent with national policy

- 3.21 The policy supports uses considered acceptable in the built areas of the district, in a manner consistent with national policy⁴⁴. Similar development in town centre locations is provided in accordance with Core Policy 32⁴⁵. The policy supports economic growth in rural areas in order to create jobs and prosperity, including supporting sustainable rural tourism and leisure developments that benefit businesses in rural area, communities and visitors, and which respect the character of the countryside⁴⁶.

Issues Raised

- 3.22 The Council has reviewed and considered the representations⁴⁷ made on this policy. The main issues relate to the level of hotel accommodation that the policy allows for Local Service Centres. The Joint Hotel Needs Assessment identifies Science Vale, as well as strategic transport corridors on the edge of Oxford City as suitable locations for new hotel development⁴⁸. The two Local Service Centres of Grove and Botley closely relate well to this criteria.

Core Policy 32: Retail Development and other Main Town Centre Uses

Positively prepared

- 3.23 Policy CP32 proactively seeks to retain and enhance the vitality of the existing town centres across the district.

Justified

- 3.24 Policy CP32 is supported by the Retail and Town Centre Study 2013⁴⁹, and its 2014 Addendum⁵⁰. This evidence identifies the retail needs for the district and provides guidance on achieving this. It sets a retail hierarchy for the district as well as thresholds for all edge of and out of

⁴³ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 20 page 113

⁴⁴ NPPF Annex 2: Glossary p.53

⁴⁵ Tourism Development is an acceptable town centre use in accordance with the NPPF.

⁴⁶ CLG (2012) National Planning Policy Framework, paragraph 29

⁴⁷ Supplement to the Regulation 22 Statement (PSD01)

⁴⁸ Joint Hotel Needs Assessment (ECO08) section 5.5.5

⁴⁹ Retail and Town Centre Study March 2013 (ECO03)

⁵⁰ Retail and Town Centre Study Addendum Oct 2014 (ECO03.2)

centre retail development proposals. It also looks at the commercial leisure needs of the district, which comprise of many of the main town centre uses.

- 3.25 The Sustainability Appraisal tested two options and the Council's preferred approach partially reflects the SA findings⁵¹. The approach offers more control over the spatial distribution of town centre uses, particularly given the characteristics of retailing in a predominantly rural district.

Effective

- 3.26 The policy sets criteria for where retail and other main town centre uses⁵² are considered acceptable at various locations across the district. The policy also sets a local threshold of 1,000sq.m (in Abingdon-on-Thames and Wantage) and 500sq.m (elsewhere) on retail development proposals to require an impact assessment. It therefore provides considerable certainty on where new retail development should be located and how it will be assessed.

Consistent with national policy

- 3.27 The policy seeks to ensure the vitality of town centres⁵³ and defines a hierarchy of centres, primary and secondary shopping frontages, the use of the sequential test and locally set thresholds to trigger impact assessments.

Issues Raised

- 3.28 A number of objections sought to remove reference to Botley and local service centres supporting large-scale retail developments, as well as removal of reference to Policy CP11. The Council does not agree with this and considers its approach is consistent with the definition of town centres as set out in Annex 2 of the NPPF⁵⁴. The Council considers the shopping centre at Botley to be a defined local centre that is entirely capable of main town centre uses being developed in the future.

Question 12.3

Are the policies relating to protecting the environment and responding to climate change soundly based?

- (a) Design and Local Distinctiveness (CP37)**
- (b) Design Strategies for Strategic and Major Development Sites (CP38)**
- (c) The Historic Environment (CP39)**
- (d) Sustainable Design and Construction (CP40)**
- (e) Renewable Energy (CP41)**

⁵¹ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) Section 21 p.114

⁵² CLG (2012) National Planning Policy Framework Annex 2 page 53

⁵³ CLG (2012) National Planning Policy Framework Section 2 pages 7-8

⁵⁴ CLG (2012) National Planning Policy Framework Annex 2 p.57

- (f) Flood Risk (CP42)
- (g) Natural Resources (CP43)
- (h) Landscape (CP44)
- (i) Green Infrastructure (CP45)
- (j) Conservation and Improvement of Biodiversity (CP46)

4. The Council's Response to Question 12.3

Introduction

- 4.1 The Council considers that each of the policies dealt with under this matter are soundly based⁵⁵. To assist in responding concisely to this matter, a number of policies have been grouped together.

Design and Local Distinctiveness (CP37); Design Strategies for Strategic and Major Development Sites (CP38); and Historic Environment (CP39)

Positively Prepared

- 4.2 These three policies provide a holistic approach to bringing forward new development of good design and to conserve and enhance the historic environment.

Justified

- 4.3 National policy requires Local Plans to have a policy relating to the quality of design for new development. CP37 and 38 are supported by the Council's adopted Design Guide SPD⁵⁶. This SPD will support the implementation of the Local Plan 2031 Part 1 once adopted, and continue to support saved policies until they are replaced by Local Plan 2031 Part 2. It provides clear design principles to guide future development within the District.

- 4.4 A Historic Landscape and Characterisation Assessment (HCLA)⁵⁷ for Oxfordshire informs the selection of strategic site allocations in the Local Plan and supports Core Policy 39. The Sustainability Appraisal concludes that the three policies will have a positive effect on cultural heritage, townscape and landscape⁵⁸.

Effective

- 4.5 The policies set out a broad range of criteria to which all future planning applications will need to adhere. This will ensure that the Plan sets out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment.

⁵⁵ CLG (2012) National Planning Policy Framework Paragraph 58 and 157; CLG (2014) Planning Practice Guidance (Ref 26-003-20140306)

⁵⁶ Vale of White Horse District Council (2015) Design Guide SPD (BHE05)

⁵⁷ Oxfordshire Historic Landscape Characterisation Project (BHE01)

⁵⁸ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) pages 222-225

Consistent with National Policy

- 4.6 Policies CP37 and CP38 plan positively for the achievement of high quality and inclusive design for all new developments, and are considered to be consistent with national policy⁵⁹. Policy CP39 seeks to conserve and enhance the historic environment, whilst still enabling appropriate development and sets out a positive strategy for its conservation and enjoyment⁶⁰.

Issues raised

- 4.7 Few representations were received in respect to these policies⁶¹. The main issues focussed upon policy wording and inconsistency with national policy and statutory legislation. Historic England commented that CP39 does not set out a clear and positive strategy to protecting the historic environment. The Council has worked collaboratively with Historic England throughout the plan making process. The Schedule of Proposed Changes (DLP11) as well as an additional change (see **Appendix 1**) request minor modifications to provide further clarity and ensure consistency with national policy and legislation.
- 4.8 Oxford City Council raised an issue that there is no reference to the Oxford skyline as a heritage asset. The Council continues to protect the important views of Oxford City through saved policy NE8 and are represented on the draft policies map⁶². The Council does not consider that a further policy response is required in the Local Plan.

**Sustainable Design and Construction (CP40),
Renewable Energy (CP41),
Flood Risk (CP42) and,
Natural Resources (CP43)**

Positively Prepared

- 4.9 These four policies are considered to provide a holistic approach to conserving and enhancing the natural environment.

Justified

- 4.10 The Council drew on a robust evidence base to support core policies relating to climate change mitigation and adaptation. A Strategic Flood Risk Assessment (SFRA)⁶³ and a Water Cycle Study⁶⁴ have been prepared. The SFRA has informed the plan-making process, including policy formulation and the strategic site selection process.

⁵⁹ CLG (2012) National Planning Policy Framework Paragraph 57; CLG (2014) Planning Practice Guidance Paragraph (Refs 26-006-20140306; 26-015-20140306; and 26-023-20140306)

⁶⁰ CLG (2012) National Planning Policy Framework Paragraph 126

⁶¹ Supplement to the Regulation 22 Statement (PSD01)

⁶² Abingdon and Oxford Sub-Area Policies Map (DPL03a)

⁶³ Strategic Flood Risk Assessment (WWF03)

⁶⁴ Water Cycle Study – Updated Phase 1 Study (incorporating Water Quality Assessment) (WWF01.1)

- 4.11 These policies have been tested through Sustainability Appraisal (SA) and public consultation⁶⁵. The SA concludes that these policies create significant positive effects on increasing the resilience to climate change and flooding and reducing carbon emissions.

Effective

- 4.12 Like other policies in this part of the Plan, they contain a range of criteria to which any future development proposals will have to address. Such examples include requirements to provide resilience to climate change, the provision of a drainage strategy, the need for sustainable drainage systems, maximising passive solar heating, using recycled and energy efficient materials, and re-using previously developed land.

Consistent with national policy

- 4.13 These policies seek to deliver climate change mitigation and adaptation taking account of flood risk and water supply⁶⁶. They also maximise renewable and low carbon energy development and take full account of flooding issues across the district⁶⁷.

Issues raised

- 4.14 Few representations were received to these policies⁶⁸. One particular issue relates to climate change mitigation and adaptation (CP40 – CP43). This has been addressed through the statement of common ground with the Environment Agency and Thames Water⁶⁹.

Landscape (CP44)

Positively Prepared

- 4.15 Policy CP44 seeks to protect and enhance valued landscapes, including nationally and locally significant landscape character designations.

Justified

- 4.16 The Oxfordshire Wildlife and Landscape Study (OWLS)⁷⁰ is a landscape character assessment that covers the whole of the county. It identifies the local landscape character areas for the district and these will be used to help judge and determine planning applications. Other important documents include the AONB Landscape Character Assessment. Policy CP44 has been refined at each stage of the plan-making process and tested through the Sustainability Appraisal⁷¹. The outcomes of the appraisal conclude that the policy will have minor

⁶⁵ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) pages 226-232

⁶⁶ CLG (2012) National Planning Policy Framework Paragraph 156

⁶⁷ CLG (2012) National Planning Policy Framework Paragraph Section 10

⁶⁸ Supplement to the Regulation 22 Statement (PSD01)

⁶⁹ Statement of Common Ground with the Environment Agency and Thames Water (SCG08)

⁷⁰ Oxfordshire Wildlife and Landscape Study (OWLS) available to view online at

<http://owls.oxfordshire.gov.uk/wps/wcm/connect/occ/OWLS/Home/>

⁷¹ SA of the Vale of White Horse District Local Plan 2031 Part 1 (DLP04) pages 232-233

positive effects on a number of sustainability objectives, and no negative outcomes.

Effective

- 4.17 Policy CP44 provides general protection for landscape features and supports development that integrates into the existing landscape character or townscape. Conservation and enhancement of the North Wessex Downs is also a priority for this policy.

Consistent with national policy

- 4.18 Policy CP44 seeks to deliver conservation and enhancement of the natural and historic environment, including designated landscapes but also the wider countryside and is considered to be consistent with national policy⁷².

Issues raised

- 4.19 Issues raised in representation predominantly relate to the proposed strategic allocations North of Harwell Campus and East of Harwell Campus. The Council's response to these representations is covered through its statement in response to Matter 6.
- 4.20 Other issues were raised by CPRE, North Wessex Downs AONB Board and Chilton Parish Council, who consider that Policy CP44 does not refer to national and statutory legislation. The Council proposes a minor modification to CP44 to include a cross reference to the North Wessex Downs AONB Management Plan and the statutory legislation, CRoW Act 2000 (**Appendix 1**). This will provide further clarity and effectiveness to the policy.

**Green Infrastructure (CP45) and
Conservation and Improvement of Biodiversity (CP46)**

Positively Prepared

- 4.21 These two policies principally seek to conserve and enhance the natural environment.

Justified

- 4.22 Policies CP45 and CP46 have been refined and tested at each stage of public consultation and through Sustainability Appraisal (SA). The SA concludes that the policies will create a positive effect on a number of objectives including the natural environment, biodiversity, water and soil quality and improving health and well-being.
- 4.23 The Council is also continuing to work with South Oxfordshire District Council to prepare an up to date Green Infrastructure Strategy for both districts. This will provide an inclusive strategy for green infrastructure.

⁷² CLG (2012) National Planning Policy Framework Paragraph 99, 109, 113; CLG (2014) Planning Practice Guidance (Ref 8-001-20140306)

This commitment is reflected in the statement of common ground with South Oxfordshire District Council⁷³.

Effective

- 4.24 Policy CP45 requires all major planning applications to be accompanied by a statement, demonstrating that they have taken into account the relationship of the proposed development to existing Green Infrastructure and how this will be retained and enhanced. The policy also requires proposals to contribute to the delivery of new Green Infrastructure and/or improvements of existing assets.
- 4.25 Policy CP46 sets criteria on which proposals will be assessed as well as clearly identifying the various sensitive designations to which these criteria will apply.

Consistent with national policy

- 4.26 Policies CP45 and CP46 clearly support the creation, protection, enhancement and management of networks of biodiversity and green infrastructure in accordance with guidance set out in paragraph 114 of the NPPF⁷⁴.

Issues raised

- 4.27 Few representations were received with respect to these policies⁷⁵. The Council has proactively engaged with Natural England on developing these policies through previous consultations. A minor modification is proposed to the wording of CP46 which is set out in the Schedule of Proposed Minor Changes⁷⁶.

5. Conclusion

- 5.1 The sections above demonstrate that each of the policies contained within this matter are soundly based. That is to say that these policies are positively prepared, justified, effective, and consistent with national policy. Requested minor modifications to these policies are identified in Appendix 1.

⁷³ Statement of Common Ground with South Oxfordshire District (SCG02)

⁷⁴ CLG (2012) National Planning Policy Framework Paragraph 114

⁷⁵ Supplement to the Regulation 22 Statement (PSD01)

⁷⁶ Schedule of Proposed Minor Changes (DLP11)

Appendix 1:

The Council's Suggested Modifications in relation to Issues raised to Matter 5.

Ref.	Issue Raised	Modification Suggested
CP28	Vale of White Horse District Council – Policy wording	Amend first sentence of policy as follows: “Proposals for new employment development (use classes B1, B2 or B8) will be supported on unallocated sites in town centres and larger villages <u>the built up area of market towns, local service centres, larger and smaller villages</u> provided that:...”
CP39	Vale of White Horse District Council – Cross-referencing	Include footnote reference to Planning (Listed Buildings and Conservation Areas) Act 1990
CP44	North Wessex Downs AONB Board; Chilton Parish Council; CPRE – Cross-referencing	Include footnote reference to AONB Management Plan and CRow Act 2000
CP45	Vale of White Horse District Council - Typographical error	Amend first sentence of second paragraph as follows: “Proposals for new development must provide adequate Green Infrastructure in line with the Green Infrastructure Strategy”.