

## Background Paper C(ii): Responding to Flood Risk

### 1 Introduction

- 1.1 The Core Strategy sets out the long-term strategy for development in Oxford until 2026. It contains a spatial strategy for Oxford, which sets out the planning framework for the city. Areas of search for strategic sites are included, where it is intended that larger scale new development will be located.
- 1.2 The Core Strategy's spatial strategy deals with the key objectives of balancing Oxford's housing and employment needs, reducing carbon emissions by locating development to reduce the need to travel, and maximising the use of previously developed land. It also seeks to integrate new strategic areas of growth with existing communities.
- 1.3 More precise detail about locating new development will be set out in later documents that feed from the Core Strategy, such as a proposed Site Allocations document. The Site Allocations document will focus in detail on suitable sites and uses across Oxford. Nevertheless, the Core Strategy is providing the broad strategy to accommodate the necessary amount of new development, particularly housing. It is important that as the Core Strategy will guide future development and change in Oxford, it has been informed by a thorough consideration of flood risk.
- 1.4 A Strategic Flood Risk Assessment was carried out for the City Council, and this has informed the Core Strategy. Some small parts of the proposed areas of search for new development are in Flood Zones 2, 3a and 3b (see **Appendix 1** and **Table 2**). Therefore, a sequential approach must be taken to locating development across the City.
- 1.5 This background paper sets out the approach taken to flood risk and to determining the strategic areas for development, in line with PPS25: Development and Flood Risk.

### 2 The Spatial Strategy: Quantum of development

- 2.1 The Core Strategy sets out the balance of new development that is appropriate in Oxford until 2026. Targets for new housing development are set regionally. Due to the need for housing and in order to meet targets, all opportunities should be explored for delivering housing on suitable sites. Oxford is a sustainable location for housing because of its well-established bus and cycle networks, and its social infrastructure made up of extensive retail, health, leisure, cultural and community provision. It is important that the Core Strategy strikes a balance between allowing for new housing development and maintaining a good mix of other services and amenities for residents and ensuring the city's economic health.

### **Housing requirements**

- 2.2 The overall quantum of new housing development that must be provided in Oxford is set out in central government and regional policy. PPS3 expects the City Council to identify enough sites to maintain a rolling 5-year delivery of housing. The Secretary of State's Proposed Changes to the South East Plan set a target for Oxford of 8,000 dwellings between 2006-2026. This equates to an average of 400 dwellings per year and totals 2,000 dwellings over the first 5 years. The Core Strategy policy on housing growth (Policy CS24) therefore states that provision of land will be made for an average annual completion rate of a minimum of 400 dwellings for the period 2006-2026, to achieve a total of at least 8,000 additional dwellings (or any other figure set out in the South East Plan).

### **Employment uses**

- 2.3 Although Oxford's economy has many strengths, an Employment Land Study<sup>1</sup> has shown that there is a danger of complacency about the City's economic health. It is important that the Core Strategy allows for some growth of employment uses. The Central Oxfordshire sub-region, of which Oxford is the hub, forecasts an increase of 18,000 jobs within the period from 2006 to 2016. Oxford, as a focus for a 'Diamond for Investment and Growth', has to make a significant contribution towards meeting these aims and securing the prosperity of the South East.
- 2.4 To ensure continuing economic success, key sectors of the economy need to be nurtured and developed through a policy of managed growth, which protects existing employment sites and allows for a moderate increase in employment floorspace.

### **Other uses**

- 2.5 Housing and employment are not the only new uses that are considered in the Core Strategy. It is important that infrastructure to support new development is in place. However, there is less need for land for other uses, and the strategic development sites are only identified as being needed for housing and employment.

## **3 Strategy for locating new development**

### **Previously developed land**

- 3.1 There are a number of things to consider when developing a spatial strategy to identify the broad areas that new development is to be directed to. It is most sustainable to locate development on previously developed ('brownfield') land where possible. By far the largest new land use proposed in Oxford is housing. Providing new housing on previously developed land within the existing built-up area enables people to live closer to shops, services, and places of work. It can help to reduce the need to travel, as well as helping to sustain existing businesses and facilities in the locality. The City Council's strategy is to meet development needs as far as possible by making efficient

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<sup>1</sup> *Oxford Employment Land Study* (Mar 2006) Nathaniel Lichfield

use of previously developed land. Using previously developed land in this way helps to protect valuable open space within and around Oxford.

3.2 A Strategic Housing Land Availability Assessment (SHLAA)<sup>2</sup> has been prepared by the City Council as part of the evidence base for the Core Strategy. The SHLAA contains a desktop assessment of the suitability of land within Oxford. From this it assesses where the numbers of new dwellings required in Oxford can be provided and identifies how much housing could be provided on suitable previously developed land. From this it can be derived how much would be required on suitable greenfield sites. It shows that, in order to meet housing targets and to maintain a rolling 5-year supply of deliverable housing sites over the Core Strategy period, it will be necessary to identify some strategic development sites. The SHLAA will be continually updated to provide the most up-to-date information on suitable sites. However, whilst the SHLAA will list and map sites within Oxford, it is not allocating land for housing. It assesses sites likely to become available for new housing, but inclusion of a site in the document does not mean any technical assessment has been carried out to show that it is suitable for housing. The Site Allocations DPD will allocate non-strategic sites for development.

3.3 The following sources of new sites were appraised in the SHLAA initially:

- Sites allocated for or partly for residential in the Local Plan. The principle for residential use on sites allocated in the Local Plan has already been established. However, the potential of the sites was reviewed in the SHLAA. All those yet to be developed were found to be suitable;
- West End sites allocated for or partly for residential in the Local Plan or identified as an indicative use in the WEAAP;
- Sites allocated for non-residential uses in the Local Plan;
- Sites with Planning Permission that have not been implemented or completed (of approximately 10 dwellings or 0.25 ha or greater);
- Sites where planning permission was refused but where the site is considered suitable for housing;
- Sites pending decision where the site is considered suitable for housing;
- Sites not in the planning process: basic desktop study (sites suggested by landowners for the draft SHLAA and later);
- Sites not in the planning process: detailed map survey of the built up area. Ordnance Survey maps and aerial photos were used to identify potential sites. This was followed up by site visits.

3.4 When searching for new sites not already in the planning process, only sites that could accommodate 10 or more dwellings and that are within the built up area were considered.

3.5 Some employment development will take place in the West End, and through the modernisation and redevelopment of previously developed land. However, it will also

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<sup>2</sup> *Oxford Strategic Housing Land Availability Assessment* (Aug 2008) Oxford City Council

be necessary to bring forward at least one significant area of greenfield land to meet the employment needs that have been identified during the Core Strategy period.

#### **Development in areas of deprivation**

- 3.6 Oxford has pockets of significant deprivation. Development in these areas will not only focus on previously developed land but will also bring about positive change in a number of ways. It can improve the mix of housing, provide new community facilities and employment opportunities, enhance the environment and improve accessibility. A key element of the spatial strategy is to harness growth and development to help achieve the regeneration of deprived areas.

#### **Developments in the city centre and district centres**

- 3.7 The city centre will continue to be the main focus for developments that attract a large number of people, as it serves a wide catchment area. Its role as a Primary Regional Centre will be enhanced through the renaissance of the West End.
- 3.8 The district centres complement the city centre by providing retail and service facilities for the local population. They are also the focus for many social and cultural activities. District centres will be expected to accommodate a greater share of future retail development during the Core Strategy period, given that scope in the city centre will be limited following implementation of the Westgate and St Aldates/Queen Street schemes. District centres will also be appropriate locations for other uses such as employment and leisure, and residential may be appropriate on upper floors.

#### **Strategic sites**

- 3.9 Strategic sites or areas of search should be identified where these are considered centrally important to the strategy. The SHLAA and employment land study both provide evidence to show that strategic sites will be required in the Core Strategy period in order to meet the aims of the Core Strategy.
- 3.10 The City Council used a site size threshold of 10 hectares to judge whether or not a site is 'strategic' and has potential to accommodate fairly significant amounts of new development. Most of these are sites currently safeguarded for future development in the Local Plan. The potential strategic development sites are at Summertown, Barton, the West End and Northern Gateway, although Summertown is unlikely to come forward during the Core Strategy period unless the operational requirements of the landowners change. Another potential site put forward in the Core Strategy Preferred Options document is Southfield Golf Course. However, this site has not been taken forward, as background work has shown that it is less suitable for development than the other strategic sites.
- 3.11 The West End represents the only significant area of potential for new development within the built up area. It is a city centre area, so has good transport links. Development of that area also has the potential to bring many sustainability benefits

Beyond this, greenfield sites have had to be considered. The other 3 potential strategic sites are safeguarded land between the green belt and the edge of the built up area.

#### 4 Implications of flood risk on the Spatial Strategy (the Sequential Test)

4.1 As described above, the Core Strategy intends to direct development to previously developed land. Retail and uses that attract a lot of visitors will be focused on the city centre and district centres. The SHLAA has been used to identify whether other sites are needed. Some greenfield sites will be required for housing and employment use.

4.2 As well as it being important that greenfield sites are not allocated for development if previously developed land is available, it is also important that potential areas of development that include areas of flood risk are only considered for development if there are not enough sites available in areas of lower flood risk.

##### Assessment of sites in flood risk

4.3 The sites identified in the SHLAA have been compared to the Flood Zone maps produced as part of the SFRA, to assess their level of flood risk. The table in **Appendix 1** shows all the sites identified in the SHLAA (which includes the potential strategic development sites) and their levels of identified flood risk. The sites are listed by degree of flood risk. This helps to show the quantum of housing development that can be provided on sites in Flood Zone 1, and whether this provides enough housing or shows that sites in higher risk areas need to be considered. **Table 1** summarises Appendix 1 and shows the amount of housing that can be delivered from sites identified in the SHLAA within each Flood Zone.

**Table 1: Summary of housing that can be delivered on sites in each Flood Zone (using sites identified in the SHLAA).**

Flood Zone	Housing that can be delivered on SHLAA sites in each Zone	Cumulative total
1	1891	1891
2 with 1	255	2146
2	51	2197
3a with 1/2	556	2753
3a	25	2778
3b with 1/2/3a	1480	4258

*\* please note that the total in this table does not tally with Table 18 in the SHLAA. The SHLAA makes an allowance for the fact that some sites will not come forward or will not be developed to their full potential, but the intention of the sequential test is to look at the full potential of identified sites. Also, the SHLAA includes a further possible 620 dwellings that may come forward from suitable sites with planning permission. The flood risk of these sites is not specified, as the sites already have permission, but the total amount of potential new housing considered by the SHLAA can be considered to be 4823*

- 4.4 **Table 2** gives more detail about the areas of search for the potential strategic development sites. This table shows that the West End area has the highest proportion of its area in Flood Zones 3a and 3b. Northern Gateway and Southfield Golf Course are entirely within Flood Zone 1.

**Table 2: Table to compare % flood risk on potential strategic development sites**

Strategic site	Area in Flood Zone (Hectares)									
	Zone 1		Zone 2		Zone 3a		Zone 3b		Total site	
	Ha	%	Ha	%	Ha	%	Ha	%	Ha	%
West End	34.17	49.0	19.56	28.1	10.94	15.7	5.044	7.2	69.71	100
Barton	32.2	89.9	0	0	0	0	3.62	10.1	35.82	100
Northern Gateway	18.1	100	0	0	0	0	0	0	18.1	100
Summertown	14.81	87.3	0.72	4.2	0.69	4.1	0.75	4.4	16.97	100
Southfield Golf Course	34.7	100	0	0	0	0	0	0	34.7	100

#### Locating development first in sites in lower risk Flood Zones

- 4.5 It is important to identify whether development can all be directed to parts of the City that are at less risk of flooding. This is particularly important when considering housing, as this is the largest 'more vulnerable' use proposed across the City.
- 4.6 Ideally, all uses should be located in Flood Zone 1, or Flood Zone 2 if this is not possible, in which case an exception test would be required for highly vulnerable uses, or they should be swapped with another use in Flood Zone 1. Flood Zone 3a should be used if required only for less vulnerable and water compatible uses. An exception test is required for essential infrastructure and more vulnerable uses. Highly vulnerable uses are not appropriate. Only water compatible uses are suitable for Flood Zone 3b, or essential infrastructure if an exceptions test is passed.
- 4.7 **Appendix 1** shows that there are not enough potential sites in Flood Zone 1 to meet housing need, so Flood Zone 2 was considered. This still did not provide enough potential sites. Sites that had parts in Flood Zone 3a or 3b were considered where they also had parts in lower risk Flood Zones. However, this only applied to potential sites that had previously been identified (in the Local Plan) or to areas of search where the specific site boundary has not yet been identified. Of the sites included in the SHLAA, 17 are in Flood Zones 3a or 3b. The sites are considered further in section 4. Of these sites, 7 are indicated in the West End Area Action Plan (all of which were brought forward from the Local Plan), for which a separate sequential test has been carried out. Two sites are areas of search, for which boundaries have not yet been defined. Of the remaining sites, all are already allocated in the Local Plan. It is reasonable to include them in the SHLAA as potential sites as the first stages of the SHLAA demonstrated that there are not enough identifiable sites to meet the full 15-year PPS3 period or the 20 year Core Strategy period. However, the site allocations document will need to assess their suitability more closely.

- 4.8 A decision was taken that the SHLAA would not include any newly identified potential sites in Flood Zones 3a or 3b. It was not necessary to look to sites in Flood Zones 3a and 3b at this stage, because SHLAA guidance suggests 3 further potential sources of sites. Where a shortfall in the potential supply from identifiable sites is found, the 3 potential additional sources of sites are as follows:
- a) reviewing Green Belt boundaries.
  - b) identifying broad locations. This includes areas outside of existing settlements and areas within existing settlements where planning policy seeks to promote development.
  - c) Making a case for an allowance of windfalls.
- 4.9 A small scale review of the Green Belt was already included as part of the SHLAA. As the boundary of Oxford is tightly drawn, with no areas outside of the existing settlement, there is no potential to identify broad locations for development. There is no Local Plan or LDF policy that actively encourages redevelopment in a particular area of Oxford because development is equally encouraged in suitable locations across all areas of Oxford.
- 4.10 Therefore, it was decided that a case should be made for an allowance of windfalls. Although the sequential test offers some justification for looking to sites in Flood Zone 3a and 3b, it was decided that this was to be avoided as far as possible whilst the potential for windfalls was considered. Making a case for an allowance of windfalls requires that there are genuine local circumstances that prevent specific sites being identified and positive planning policies that actively encourage windfalls in parts of Oxford. Windfalls are in fact encouraged across Oxford, rather than in any specific area. To encourage windfalls in one area may discourage them in another. The SHLAA provides the justification for making an allowance for windfalls. It is estimated in the SHLAA that 200 dwellings per year is an appropriate estimate for windfalls. To make up the identified shortfall in the SHLAA of 2,108 dwellings, only an average of 124 windfall dwellings would be required over the 17 year period from adoption of the Core Strategy (2009/10-2025/26).

#### **Potential to locate more vulnerable uses on lower flood risk sites**

- 4.11 As part of the sequential test, consideration should be given to the possibility of swapping 'more vulnerable' and 'highly vulnerable' uses with other less vulnerable uses. Housing is by far the largest more vulnerable use proposed for Oxford. The possibility of moving housing from a site in flood risk to another site needs to be considered.
- 4.12 As the Core Strategy is not a site allocations document, it is difficult to consider the potential for swapping land uses so that the more vulnerable uses are concentrated on the areas of lower flood risk. The SHLAA reviews potential housing sites in order to identify whether housing number targets set regionally will be met. However, the intention of the SHLAA is not to undertake full technical analysis of the suitability of the

sites for housing, and the Core Strategy does not refer to the SHLAA sites as necessarily suitable for housing.

- 4.13 Another significant land use in Oxford is employment use. This generally falls into the category of less vulnerable use, so it is appropriate that this use is considered for sites at higher risk of flooding, above more vulnerable uses such as housing. Significant amounts of employment land in Oxford have already been lost to other uses over the years, leaving a fairly limited supply remaining. If Oxford's supply of suitable employment space diminishes, this could threaten its role as a leading centre of knowledge based industries. The Employment Land Study concluded that protected and allocated sites should be strongly protected as they ensure a range of different types and sizes of sites and employment uses. In many cases, employment sites are very well established sites that have had millions of pounds invested in them. BMW, the hospitals, universities etc are not going to leave their sites and make them available for housing. The Core Strategy is in favour of retaining existing employment sites. Nevertheless, the SHLAA assessed the suitability for housing on allocated employment sites, protected employment sites and any other employment sites in Oxford that could accommodate a significant number of dwellings.
- 4.14 Most employment sites were considered unsuitable for housing, other than Falklands House on Oxpens Road and the maintenance depot, Lanham Way. Thus there is no identified potential for housing to be located on employment sites instead of in flood risk zones. This exercise will need to be undertaken more thoroughly in any site allocations document.
- 4.15 It is vital that Oxford maintains its reputation of excellence in education and medical research and facilities. Because of the identified likely need for new non-food retail space, sites should be retained in retail use where possible. It is also important that recreational and community uses are maintained as these are important in delivering socially cohesive and active communities. The Core Strategy therefore takes the view that the Local Plan assumption to retain existing sites and support their development should be continued.
- 4.16 All allocated non-residential or employment sites were considered and deemed unsuitable for housing. The broad conclusion of the SHLAA is that sites in these uses are unsuitable for housing because they are still required for other uses. However, as part of any site allocations document, sites will need to be looked at in more detail and more consideration will need to be given to the suitability of land for different uses.
- 4.17 The Core Strategy does identify strategic sites for development. Consideration should be given to whether more vulnerable uses suggested for strategic development sites that include Flood Zone 2, 3a or 3b could be swapped with a less vulnerable use located in an area at lower risk of flooding.

- 4.18 **Table 2** above shows that, of all the strategic development sites, the Northern Gateway and Southfield Golf Course are at lowest risk of flooding and should therefore be considered first for development. Southfield Golf Course has not been taken forward as a strategic development site. Evidence base studies prepared for the Core Strategy have shown that there are ecological and hydrological constraints that mean that site would be very difficult to develop without causing harm to a SSSI.
- 4.19 The Northern Gateway site has been allocated in the Core Strategy for employment-led development, with a small element of housing development potentially considered suitable. Because of its low flood risk, this site must first be considered for the more vulnerable use of housing. However, other sustainability considerations mean that the site is less suitable. The Northern Gateway site is divided by sections of the A44 and A40. It is also close to an elevated section of the A34 trunk road. The background noise this creates and the segregation of the site from the rest of Oxford mean that it is not a suitable location for housing development. Employment-led development on this strategically important location at the northern edge of Oxford will offer the opportunity for a high-quality development to create a landmark 'northern gateway' to the City.
- 4.20 All potential sites suitable for housing have been indicated for housing in the SHLAA. There are no sites that the use can be swapped with.

## 5 The Exceptions Test

- 5.1 Development of sites in Flood Zone 3a for housing will require an exceptions test. To pass the exception test, it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and that development is on previously-developed land or that there are no reasonable alternatives on previously-developed land. An FRA will also be required to demonstrate that the development will be safe, without increasing flood risk elsewhere, and where possible, it will reduce flood risk overall. This part of the exceptions test can only be carried out by a developer once a detailed scheme is proposed. Policy CS13 sets out that an FRA will be required for all developments in Flood Zone 3a (as well as for sites in Zone 3b and 2 and any sites over 1ha).
- 5.2 It has already been established that there is not enough previously developed land to meet development needs. Therefore, strategic sites have been considered, which are largely on greenfield land. There are no other alternatives.

### **Sites for which an exceptions test may be appropriate or which are deemed inappropriate for use**

- 5.3 The SHLAA has included 8 potential housing sites which are Flood Zone 3a. As discussed above, these are sites already in the planning system, rather than newly identified sites. The SHLAA does not allocate these sites. However, the lack of sufficient potential sites in lower risk Flood Zones to achieve housing numbers targets means that it is considered

appropriate to include them as potentially suitable sites. Their suitability for housing will need to be more fully considered for any site allocations document.

- 5.4 As well as potential sites in Flood Zone 3a, which could be used for housing if justified in a sequential and exceptions test, the SHLAA also considers 9 sites in Flood Zone 3b. Only water compatible uses and essential infrastructure are considered suitable in this Flood Zone. However, all of the identified sites include only an element of Flood Zone 3b. The Northfield School site, Leafield Road, Lamarsh Road, Arthur Street and Cowley Marsh Depot are sites already in the planning system. All of these sites have areas that fall outside of Flood Zone 3b. The potential amount of housing identified for these sites considers only the areas outside of Flood Zone 3b. Any site allocations document will need to consider these sites more carefully for their suitability for housing and in terms of the site boundary defined. Two of the sites that include an area of Flood Zone 3b have already been discussed in the sequential test carried out for the West End Area Action Plan (Oxpens and Oxford and Cherwell Valley College). The West End as a strategic location for development is discussed below. The other 2 sites are Barton and Summertown, which are in fact only areas of search, and which are also considered below.

#### **Land at Barton**

- 5.5 The Barton area of search is focused on the area of land safeguarded for future development in the Oxford Local Plan. The exact mix of uses and the precise boundaries of the development site will be determined in a Barton Area Action Plan. The area of search lies predominantly to the west of the Barton estate and north of the ring road and is mainly Greenfield land. 90% of the area of search is within Flood Zone 1. However, because part of the site is identified as being within Flood Zone 3b, the site is therefore regarded as functional floodplain, which means that only water compatible uses are considered appropriate, or essential infrastructure if an exceptions test is carried out. Open space is a water compatible use that is proposed for the Barton site.
- 5.6 The SFRA has identified part of the site as flood zone 3b because it is within the floodplain for Bayswater Brook. However, no detailed modelling has been carried out for Bayswater Brook. An FRA will be required for the area before any development goes ahead. The SHLAA specifies that any FRA for the site should investigate the flood zone classification of Bayswater Brook to more accurately reflect the functional flood plain; this may find that none of the area, or a much smaller area, is in fact in flood zone 3b. Because of the lack of existing detailed information, a cautious approach has been taken, and the area subject to flooding has therefore been identified as being in the highest risk zone.
- 5.7 A vast majority of the area of search is within flood zone 1. The only part of the area of search within the floodplain adjoins the Bayswater Brook and is a linear feature on the edge of the site. It will be highly valuable as open space, and it will not form part of the

housing site. Policy CS8 (land at Barton) of the Core Strategy states that an appropriate buffer zone will be incorporated alongside the Bayswater Brook.

- 5.8 Development of the Barton site will offer many regeneration and sustainability benefits. The Core Strategy briefly sets out how development of the land will be linked to the regeneration of Barton and Northway. This will be through the physical integration of the new development with the existing estate, the provision of new access routes and community facilities, and the potential for new residents to help sustain existing shops and services.
- 5.9 Development of strategic sites close to areas in need of regeneration should seek to ensure that the new developments are well integrated physically and functionally with the existing urban fabric, and also attract investment that stimulates regeneration to benefit deprived communities. The location of this site adjoining the Barton estate and opposite the Northway estate, two of the City Council's priority areas for regeneration, presents an opportunity for development to act as a catalyst for regeneration.
- 5.10 It is not considered appropriate to allocate much of the site for the less vulnerable office use. Development within the area of search is important to help meet the housing need identified for Oxford. In addition, at least 50% of housing will be affordable, which will contribute to the huge need for affordable housing identified in Oxford. The required housing mix will be identified when more detailed work is carried out. However, a significant amount of family housing is likely to be provided, which is important in meeting one of the key objectives identified for Oxford. The site is next to an established residential area, and housing development is, in that respect, highly suitable. Only a small part of the site is identified as in Flood Zone 3a. Therefore it is considered that a careful arrangement of the parts of the site will mean that no housing, and possibly even no office development, will need to be located in the flood zone 3a.

#### **Land at Summertown**

- 5.11 Development of the Summertown site is not currently anticipated to be achievable in the foreseeable future, but may become so if the landowners no longer need the site for operational purposes. The Core Strategy protects the site from development that would prejudice its housing potential. Some of the area of search for a housing site in Summertown is identified as being within Flood Zone 3b. Only a small part of the south east corner of the site is located within Flood Zone 3b (4.4%). A similarly small amount of the area of search is within Flood Zone 3a (4.1%). Nearly 90% of the area of search is within flood zone 1. There are also no groundwater or surface water flooding issues identified in proximity to the area of search.
- 5.12 If part of the area of search is to be used for housing (with a small amount of other uses), it must avoid flood zone 3b. More vulnerable uses will not be located on flood zone 3a; in fact it is very unlikely that the part of the area of search in flood zone 3a will be identified as part of the development site at all. If it is used, it will be only for water

compatible uses. These areas of higher flood risk are near to the river, which is an excellent area to use as open space and to encourage biodiversity.

- 5.13 Development within this area of search would help to meet the housing need identified for Oxford. The close proximity of services available in Summertown, and the public transport links to the city centre and other areas of employment, including the John Radcliffe Hospital, makes Summertown a highly sustainable location for housing development and many sustainability benefits to the community are to be gained.
- 5.14 Whilst the SFRA shows that some of the area of search is in Flood Zone 3b, and therefore unsuitable for development, it is clear that this part of the area of search will not be needed for development. The site is a very sustainable location for development in many ways. The SHLAA has already established that there is no alternative but to use some greenfield sites. Southfield golf course and Northern Gateway are the only other potential strategic greenfield sites identified during the Core Strategy process and, as explained above, these sites are not considered suitable for housing development.

#### **West End**

- 5.15 The West End area of the city centre has significant opportunities for a mixed-use modern, economically and socially sustainable range of developments. It offers the potential for significant housing provision, and a high quality network of streets and public spaces, and new leisure, retail and cultural attractions and office space. It is hoped that development in the West End will include the expansion of the station, bringing big sustainability benefits in terms of greater capacity at the station, leading to fewer delays, and potentially to more trains. Some employment development will take place through the modernisation and redevelopment of existing previously developed land. It is important that regeneration of this currently run down area can take place. A sequential test for development in the West End has already been carried out, and gives justification for locating development in the West End.
- 5.16 The advantages of developing in the West End, such as siting new development in an accessible city centre location, creating a more attractive and clear route from the station to the city centre, and drawing new development to this important part of the city centre, cannot be achieved by sites elsewhere.

## **6 Conclusions**

- 6.1 Using the information about possible housing sites in the draft SHLAA, it is clear that housing sites in Flood Zone 3a will be required in order to meet the Government's housing targets. However, the approach has been taken that sites in Flood Zone 3a should only be considered exceptionally, even though housing targets are still not met and windfalls will need to be relied upon.

- 6.2 The SHLAA has only considered sites in Flood Zone 3a if they are already identified in the Local Plan, or if they are located in the West End (sites in the West End are mainly identified in the Local Plan in any case). As already established, development of sites in the West End brings many advantages. Other than this, it was considered preferable to set out the case for a reliance on windfalls as a way of achieving housing targets, rather than the SHLAA considering sites that are in Flood Zone 3 and currently outside of the planning system (and strategic sites).
- 6.3 An analysis of the strategic sites and SHLAA sites shows that there is no possibility of swapping more vulnerable uses for less vulnerable uses, although this exercise will need to be undertaken more thoroughly for the site allocations document. The possibility of the strategic sites passing the exceptions test was considered. There are no brownfield alternatives to the strategic sites. The SHLAA considered all potential sites within the built-up area of Oxford, and there are not enough to meet housing targets or employment needs. The strategic sites chosen will bring sustainability and/or regeneration benefits. The site boundaries of the strategic sites are yet to be defined, and it seems clear that a careful look at the site areas of search will enable development to be kept out of the high risk Flood Zones.

## Appendix 1

Site name	Is the site achievable within 5 years	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
<b>Flood Zone 1</b>							
Between Towns Road	Yes, 2009-2014	1	-	0.56	Mixed use required on site. Small retail units on ground floor at southern end of Between Towns Road, offices towards northern end. Residential potentially above shops and adjacent to Coleridge Close. Site within District centre so higher densities are appropriate	Residential site in Local Plan/WEAAP	45
BMW Garage	No, 2014-2019	1	-	0.26	Application permitted Nov 07 for 'stop gap' redevelopment not including residential (07/02270/FUL) but potential remains for full redevelopment	Residential site in Local Plan/WEAAP	10
County Hall	No, 2014-2019	1	-	0.33	Mixed use required on site. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	65
Cowley Centre	No, 2014-2019	1	-	3.65	Priority is for retail development. Residential on upper floors only. Site within District centre so higher densities are appropriate	Residential site in Local Plan/WEAAP	50
Cuttelowe Court	Yes, 2009-2014	1	-	0.33	Capacity based upon application number 06/01655/FUL	Residential site in Local Plan/WEAAP	33
Diamond Place	Yes, 2009-2014	1	-	1.69	Mixed use required on site. Site within District centre so higher densities are appropriate	Residential site in Local Plan/WEAAP	50
Elsfield Hall	Yes, 2009-2014	1	-	0.36	Capacity based upon application number 02/00328/FUL	Residential site in Local Plan/WEAAP	24
Leiden Road site	Yes, 2009-2014	1	-	0.52	Community centre and primary health care facilities required on site	Residential site in Local Plan/WEAAP	18
Mabel Pritchard School	Yes, 2009-2014	1	-	0.42	Capacity based upon application number 07/01440/RES	Residential site in Local Plan/WEAAP	46

Site name	Is the site achievable within 5 years?	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
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Macclesfield House	Yes, 2009-2014	1	-	0.25	Priority use for site is retail. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	23
Railway Lane	Yes, 2009-2014	1	-	0.97	Capacity based upon application number 07/01186/FUL	Residential site in Local Plan/WEAAP	85
Ruskin College, Dunstan Lane	Yes, 2009-2014	1	-	1.77	Scale of new buildings needs to be appropriate to the Conservation Area. Trees to be retained. Masterplan does not show self contained units but some could be accommodated for key workers	Residential site in Local Plan/WEAAP	20
Suffolk House	Yes, 2009-2014	1	-	0.21	Mixed use required on site. Site within District centre so higher densities are appropriate.	Residential site in Local Plan/WEAAP	15
St. Augustine's School	Yes, 2009-2014	1	-	1.49	Capacity based upon application number 05/01118/RES	Residential site in Local Plan/WEAAP	74
Land to the West of St. Aldate's and south of Queen Street	Yes, 2009-2014	1	-	1	Mixed use required on site. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	20
Windmill School	Yes, 2009-2014	1	-	0.53	Capacity based upon application number 05/01602/RES	Residential site in Local Plan/WEAAP	20 (remaining)
Northfield House	No, 2014-2019	1	-	0.7	No specific issues	Residential site in Local Plan/WEAAP	35
Maintenance Depot, Lanham Way	Yes, 2009-2014	1	-	0.23	Surrounding residential is low density therefore capacity based upon 45 dph	Employment site	10
138 - 140 London Road, Headington	Yes, 2009-2014	1	-	0.06	Capacity based upon application number 04/01311/FUL	Suitable site with Planning permission	14
69 The Slade, Headington	Yes, 2009-2014	1	-	0.1	Capacity based upon application number 03/02175/FUL	Suitable site with Planning permission	11
Beckley View House and Brome Place Garage Block, Fettiplace Road	Yes, 2009-2014	1	-	0.55	Capacity based upon application number 05/00641/FUL	Suitable site with Planning permission	27

Site name	Is the site achievable within 5 years?	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
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Garages and Land East Of Warren Crescent, Headington	Yes, 2009-2014	1	-	0.37	Capacity based upon application number 02/02348/FUL	Suitable site with Planning permission	18
Hernes House Residential Home, 3 Hernes Crescent	Yes, 2009-2014	1	Existing residents would need to be accommodated elsewhere. Likely that Oxfordshire Mental Healthcare Trust would arrange	0.23	Capacity based upon application number 05/02159/RES	Suitable site with Planning permission	24
Lawn Upton House, Sandford Road, Littlemore	Yes, 2009-2014	1	-	0.85	Capacity based upon application numbers 04/02282/FUL and 04/02293/FUL	Suitable site with Planning permission	22
Rose Hill Orlit redevelopment	Yes, 2009-2014	1	Properties are currently occupied but there is a phased re-housing programme planned as part of the construction process	3.31	Capacity based upon application number 05/00639/OUT	Suitable site with Planning permission	67
Morris Motors Athletic and Social Club, 129 Crescent Road	Yes, 2009-2014	1	-	2.64	Capacity based upon application numbers 02/02046/FUL and 05/01717/VAR	Suitable site with Planning permission	60
Rear Of 25, 27 And 29 Abberbury Road	Yes, 2009-2014	1	-	0.31	Capacity based upon application number 04/01626/OUT	Suitable site with Planning permission	10
Royal British Legion Club, Hadow Road, Marston	Yes, 2009-2014	1	-	0.31	Capacity based upon application number 03/01351/FUL	Suitable site with Planning permission	16
Site Of 78 St Clements Street And 1-4 Sunset Cottages, St Clements Street	Yes, 2009-2014	1	-	0.11	Capacity based upon application number 03/02393/FUL	Suitable site with Planning permission	15
St Nicholas House, Littlemore	Yes, 2009-2014	1	-	0.29	Capacity based upon application number 04/01106/OUT and 07/01441/RES	Suitable site with Planning permission	26
Travis Perkins, Chapel Street	Yes, 2009-2014	1	Current occupier would relocate	0.72	Capacity based upon application number 04/02259/OUT	Suitable site with Planning permission	57

Site name	Is the site achievable within 5 years?	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
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Block Of Garages, Holland Place	Yes, 2009-2014	1	-	0.14	Capacity based upon application number 06/01765/FUL	Suitable site with Planning permission	11
Territorial Army Centre Slade Barracks Infantry, Mascall Avenue	Yes, 2009-2014	1	Part of the site has been released to developers but the Territorial Army are to vacate the remainder of the site in December 2008	1.78	Capacity based upon application number 07/02261/FUL. Application includes student accommodation	Suitable site with Planning permission	72
Milham Ford School	Yes, 2009-2014	1	-	1.99	Capacity based upon application numbers 03/00302/OUT and 06/01984/RES. This reserved matters permission for 47 dwellings only covers about half of the development site boundary. Existing Milham Ford School building (to be retained) to be used by Oxford Brookes for academic use	Residential site in Local Plan/WEAAP	47
Beenhams	Yes, 2009-2014	1	-	0.4	Capacity based upon application number 06/01099/FUL	Suitable site pending decision	20
King of Prussia, 76 Rose Hill	Yes, 2009-2014	1	-	0.32	Capacity based upon application number 06/02082/FUL	Suitable site pending decision	8
266 And 268 Iffley Road	Yes, 2009-2014	1	-	0.14	Capacity based upon application number 06/02423/FUL	Suitable site pending decision	13
Sunnymead Court	Yes, 2009-2014	1	-	0.23	Capacity based upon application number 07/01872/FUL	Suitable site pending decision	12
86-88 Old Road	Yes, 2009-2014	1	New application required that overcomes the reasons for refusal	0.19	Capacity based upon application number 04/00940/FUL and amended based upon reasons for refusal	Site where permission refused but principle acceptable	10
Land Rear Of 274 and 276 Woodstock Road	Yes, 2009-2014	1	New application required that overcomes the reasons for refusal	0.11	Capacity based upon application number 07/00733/FUL and amended based upon reasons for refusal. Appeal submitted. (New application 07/02355/FUL submitted post 31/03/07)	Site where permission refused but principle acceptable	6
Rear Of 40-47 Juxon Street	Yes, 2009-2014	1	New application required that overcomes the reasons for refusal	0.09	Capacity based upon application number 03/01508/FUL and amended based upon reasons for refusal	Site where permission refused but principle acceptable	8
8 Headley Way	Yes, 2009-2014	1	New application required that overcomes the reasons for refusal	0.2	Capacity based upon application number 04/02479/OUT and amended based upon reasons for refusal	Site where permission refused but principle acceptable	10

Site name	Is the site achievable within 5 years?	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
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Former Barton Road Cricket Ground	Yes, 2009-2014	1	-	1.02	Development of the site has the potential to create new publicly accessible informal and formal local open space. 0.7h likely to remain for residential. Suburban location. Capacity based upon approximate density of 50 dph and Balance of Dwellings SPD.	Basic desktop study	35
Harlow Centre and Site	Yes, 2009-2014	1	Site currently used for education support services as an office base which the County Council plan to relocate	1.06	Capacity only considers the part of the site currently occupied by buildings. Suburban location. Capacity based upon approximate density of 50 dph and Balance of Dwellings SPD. At least 10% open space assumed	Basic desktop study	47
Iffley House, Iffley	Yes, 2009-2014	1	County Council would replaced beds elsewhere and in other ways	0.59	Design will need to consider the relationship between the site and the large plots to the west of the site to ensure there is no significant impact upon the openness and character of these plots. Retention of trees within the Conservation Area. Capacity based upon approximate density of 40 dph and Balance of Dwellings SPD. At least 10% open space assumed	Basic desktop study	21
Land Adjacent TKMaxx, John Allen Centre	Yes, 2009-2014	1	-	0.05	Constrained site but within District centre so higher densities are appropriate. Site would include retail and other community facilities too. Residential on upper floors	Basic desktop study	10
Lincoln College Sports Ground, Bartlemas Close	Yes, 2009-2014	1	Lincoln College plan to would share the sports ground of Jesus College	2.34	Site is adjacent to the very sensitive Bartlemas Conservation Area. Development may be acceptable on the eastern part of the site only (1.25ha). Capacity based upon approximate density of 55 dph and Balance of Dwellings SPD. At least 10% open space assumed	Basic desktop study	68
Longlands, Blackbird Leys	No, 2014-2019	1	County Council would replaced beds elsewhere and in other ways in the long term	0.44	Site is within existing medium density residential area. A lot of on street parking exists in the area so careful design would be required to prevent exacerbating this problem. Capacity based upon approximate density of 60 dph and Balance of Dwellings SPD. At least 10% open space assumed	Basic desktop study	24
Marston Court	No, 2014-2019	1	County Council would replaced beds elsewhere and in other ways	0.42	Site is within existing medium density residential area. Capacity based upon approximate density of 60 dph and Balance of Dwellings SPD. At least 10% open space assumed	Basic desktop study	23

Site name	Is the site achievable within 5 years?	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
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Northway Centre, Maltfield Road	Yes, 2009-2014	1	-	0.78	Site would need to provide new community facilities on site perhaps also accommodating any loss from Sutton Road Hall site. Approximately 0.26ha may remain for residential. Site is within existing medium density residential area. Capacity based upon approximate density of 60 dph and Balance of Dwellings SPD. At least 10% open space assumed	Basic desktop study	14
Ormerod School	Yes, 2009-2014	1	Current educational use will be delivered in a different way in a new property	1.4	Site is within existing medium density residential area. Capacity based upon approximate density of 60 dph and Balance of Dwellings SPD. At least 10% open space assumed	Basic desktop study	75
Shotover View	Yes, 2009-2014	1	Uses will be relocated to a new office	0.58	Site is within existing suburban residential area. Capacity based upon approximate density of 50 dph and Balance of Dwellings SPD	Basic desktop study	30
Sutton Road Hall, Northway	Yes, 2009-2014	1	-	0.18	Site is within existing medium density residential area. Community use that would be lost could potentially be provided as part of new facilities on the Northway Centre site Capacity based upon approximate density of 60 dph and Balance of Dwellings SPD. At least 10% open space assumed	Basic desktop study	10
Townsend House, Barton	No, 2014-2019	1	County Council would replaced beds elsewhere and in other ways	0.44	Site is within existing medium density residential area. Capacity based upon approximate density of 60 dph and Balance of Dwellings SPD. At least 10% open space assumed	Basic desktop study	24
Union Street Car Park, Cowley Road	No, 2014-2019	1	Development at theoretical stage and feasibility studies are currently underway	0.25	Capacity based upon public exhibition undertaken in May 2007	Basic desktop study	20
Former St Augustine's playing fields	Yes, 2009-2014	1	Access issue would need to be resolved but likely from current adjacent development site. Oxon CC to clear with their statutory educational requirements	2.14	Site within existing low/medium density residential area and adjacent to new development. Capacity based upon approximate density of 50 dph and Balance of Dwellings SPD. At least 10% open space assumed	Open space	96

Site name	Is the site achievable within 5 years?	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
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Land West of Oxford Hotel (includes Land north of Godstow Road Site 10/16 in Table 10)	Yes, 2009-2014	1	-	7.78	Site not adjacent to existing residential but close to Upper Wolvercote. Consideration of the impact upon the Conservation Area may affect capacity. In the absence of noise data, it is assumed that the north half of the site may experience noise problems and therefore will be excluded from having capacity. Part of site may be required for landscaping to mitigate against traffic noise. This leaves approximately 3.67ha. Capacity based upon approximate density of 50 dph and Balance of Dwellings SPD	Green belt land	140
Manor Ground	Yes, 2009-2014	1	Remaining affordable housing	1.71	Capacity based upon application number 00/02117/NFY	Residential site in Local Plan/WEAAP	27
							<b>1891</b>

#### Flood zone 2 with flood zone 1

Westgate Shopping Centre and Abbey Place Car Park	Yes, 2009-2014 (Compulsory Purchase Inquiry due in 2008)	1 and 2	Compulsory Purchase Inquiry to try to overcome legal challenge made by existing residents on part of site	3.04	Capacity based upon application number 06/01211/FUL	Residential site in Local Plan/WEAAP	127
Worcester Street Car Park	Yes, 2009-2014	1 and 2	Further research required regarding historic environment appraisal and potential for canal basin	0.54	Mixed use required on site. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	18
Oxford Railway Station and Becket Street Car Park	Yes, 2009-2014	Majority 1, small section 2	Widening of station track likely to be required to improve station infrastructure	3.03	Only Becket Street Car Park suitable for residential. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	70
Rewley Road Fire Station	No, 2014-2019	Majority 1, small strip 2	-	0.47	Mixed use required on site. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	40

Site name	Is the site achievable within 5 years?	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
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							<b>167</b>
<b>Flood zone 2</b>							
Magistrates Court	No, 2014-2019	2	-	0.17	Mixed use required on site. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	10
Albion Place Car Park	Yes, 2009-2014	2	-	0.12	Capacity based upon application number 07/00089/CT4	Residential site in Local Plan/WEAAP	14
Telephone Exchange	No, 2019-2024	2	-	0.4	Mixed use required on site. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	27
							<b>51</b>
<b>Flood zone 3a with flood zone 1/2</b>							
Lucy's Factory site	Yes, 2009-2014	1, 2 and 3a	-	2.1	Capacity based upon application number 04/00387/FUL	Residential site in Local Plan/WEAAP	190
Wolvercote Paper Mill	Yes, 2009-2014	1, 2 and 3a	Adjacent to Flood Zone 3. Part of site within Flood Zone 2	4.65	Design must carefully consider interface with area of ecological value. Capacity based on recent masterplan which includes some employment and community facilities	Residential site in Local Plan/WEAAP	200
Island Site	No, occupied	1, 2 and 3a		Developable	Mixed use required on site. Site within cityu centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	38
St Aldate's Police Station and land to the rear	No, 2014-2019	2 and 3a	-	0.41	Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	30
Osney Mill and Works, Mill Street	Yes, 2009-2014	2 and 3a	-	0.73	Capacity based upon application number 03/02502/FUL	Residential site in Local Plan/WEAAP	12

Site name	Is the site achievable within 5 years?	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
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Scrap yard, Jackdaw Lane	Yes, 2009-2014	2 and 3a	Flood Zone 3 therefore appropriate flood protection/mitigation required	1.54	Mixed use required on site.	Residential site in Local Plan/WEAAP	70
Falklands House	No, 2014-2019	Majority 3a, partly 2	Oxford University Training Corps likely to want to stay on the site for the foreseeable future. Flood Zone 3.	0.22	If site became available, preference would be to demolish existing building and redevelop as a mixed use development (offices on the ground floor) and residential. City centre site. Capacity based on 75 dph	Employment site	16
							<b>556</b>
<b>Flood Zone 3a</b>							
Nursery and Osney Warehouse	Yes, 2009-2014	3a	-	0.43	Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	25
							<b>25</b>
<b>Flood Zone 3b with 1/2/3a</b>							
Northfield School site	No, 2014-2019	Partly 3b, remainder 1	-	3.32	Residential development should not generally extend beyond area currently occupied by buildings (approx 0.95ha). Linear park required adjacent Northfield Brook. Habitat buffer. Large portion of the site in flood plain	Residential site in Local Plan/WEAAP	50
Lamarsh Road	Yes, permission granted	3a and small part 3b	Flood Zone 3 therefore appropriate flood protection/mitigation required	2.25	Capacity based upon application number 06/01032/RES	Residential site in Local Plan/WEAAP	17
Arthur Street	Yes, 2009-2014	Majority 3b, small section 3a	Flood Zone 3 therefore appropriate flood protection/mitigation required	0.31	Mixed use required on site. Site within City centre so higher densities are appropriate	Residential site in Local Plan/WEAAP	20
Oxford and Cherwell Valley College	Yes, 2009-2014	1, 2, 3a and 3b	-	3.14	Mixed use required on site. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	40
Oxpens Road site	Yes, 2009-2014	1, 2, 3a and 3b	-	7.33	Mixed use required on site. Site within City centre so higher densities are appropriate but must consider mix set out in West End AAP	Residential site in Local Plan/WEAAP	240

Site name	Is the site achievable within 5 years?	Flood Zone	Overcoming constraints	Site size	Issues affecting capacity	Source	Estimated capacity
Leaffield Road	Yes, 2009-2014	1 with small area 3b	-	0.83	Capacity based upon application number 03/02254/FUL	Residential site in Local Plan/WEAAP	38
Cowley Marsh Depot site	No, 2014-2019	Majority 3b, remainder 1	Flood Zone 3 therefore appropriate flood protection/mitigation required	1.7	Mixed use required on site.	Residential site in Local Plan/WEAAP	75
Summertown Safeguarded Land and adjoining Summerfields School land	No, 2014-2019	Majority 1, SE corner of site partly in 2, 3a and 3b	Discussions are ongoing with the landowners. Less land may become available than was originally considered	8.9 – 11.5	Site within existing medium density residential area. Lower size estimate excludes flood plain and protected open space. Upper size estimate includes some protected private open space. Capacity includes need for new publicly accessible open space within the site and based upon 50 dph and Balance of dwellings SPD. At least 10% open space assumed	Core strategy strategic site	200
Barton Safeguarded Land	No, 2014-2019	Majority 1, strip on northern edge in 3b	Options for accessing the site need to be appraised. Type and location of access required ultimately depends on the land use(s) envisaged on the site. This will affect cost and timescale	21.1	Capacity includes need for new publicly accessible open space within the site and based upon 50 dph and Balance of dwellings SPD. Some local facilities likely. At least 10% open space assumed	Core strategy strategic site	800
							<b>1480</b>