



# The Planning Inspectorate

3/25 Hawk Wing  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol BS1 6PN

Direct Line 0117-372-8468  
Switchboard 0117-372 8000  
Fax No 0117-372-8782  
GTN 1371-8468  
e-mail: [stephen.carnaby@pins.gsi.gov.uk](mailto:stephen.carnaby@pins.gsi.gov.uk)  
<http://www.planning-inspectorate.gov.uk>

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Adrian Roche  
Planning Policy Manager  
Oxford City Council  
Ramsay House  
10 St. Ebbe's Street  
Oxford  
OX1 1PT

Your Ref:

Our Ref: PINS/G3110/429/5

Date: 15<sup>th</sup> December 2008

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Dear Adrian,

The Inspector appointed to the examination of Oxford City Council's Core Strategy Development Plan Document has asked me to communicate the following to you. Could you send any reply to the address given above so that I can send it on to the Inspector?

## **Oxford Core Strategy 2026 – Submission document**

As you will know, I have been appointed to examine the soundness of the submitted Core Strategy. I have had a initial read through of the plan, and some of the representations received, and feel that there are a number of matters that need to be raised with you at the earliest opportunity. These matters strike at the heart of the plan. My fundamental concern is the degree of deferment of decisions to subsequent plans. The deferment seems here to be very substantial, with all sections referring to subsequent plans/guidance, with the effect of placing reliance upon follow-up DPDs and SPDs to make the important decisions.

Clearly, the Core Strategy should set the scene for the more detailed subsequent plans/guidance, but there must become a point where the degree of deferment is such that important decisions are being avoided; in practice, devolved, to be considered on an ad hoc, topic by topic or area by area basis. The effect of the degree of deferment is that:-

- The policies appear mostly to be extremely general in nature, with little precision – it is very difficult to establish factual guidance beyond these generalisations, with very little added local distinctiveness.
- Many policies merely repeat/reflect national guidance, with very little added value being established.
- Without more specific guidance it is difficult to draw up meaningful indicators and targets to monitor and measure over time the success or otherwise of the plan.
- It is difficult to consider issues on a holistic basis, when little evidence is available.
- Although broad areas for development are identified there is little clear sense of what type of place is being sought.

Policies CS1 to CS10, for example, provide a sequential guide to where development should be directed. However, beyond that general guide, there is little specifics as to the scale of development, the range and mix of uses, how they relate to each other and the infrastructure necessary to achieve this. What is the vision for each of the main areas, what is the strategy seeking to achieve?



What is the strategy for employment and retailing, for example? How much needs to be provided and how will this be spread around the District? How can decisions be made as to the right amount and spread of development at a local level if there is insufficient guidance at the strategic level? How can provision on a strategic level be monitored?

The fact that objectives are mostly expressed in very general terms, together with policies deferring details to a later stage, means that it becomes very difficult to conclude whether the plan is achieving its desired goals. This is even more so the case as it is not immediately apparent from the early sections what the issues are that the plan is seeking to address.

There appears to be little firm evidence given in the plan on the infrastructure needed to be provided to support the significant scale of development proposed in the city. The delivery of support infrastructure will be crucial to the delivery of the regeneration areas in particular. Is this likely to be achievable? Are the regeneration areas realistic and achievable in all the circumstances?

This concern may reflect a more general absence of pointers to the evidence base. Whilst a substantial evidence base has been submitted with the plan, there are few clear pointers in the document itself to support the approach adopted.

As you will see, these matters go to the heart of the soundness of the strategy. They are issues that I will need to address in my examination of the plan and be fully satisfied on if the plan is to be found sound. I would welcome your early comments on the issues raised. In particular I would welcome your views on the best way forward. Are my concerns unfounded, in that I have misunderstood your strategy. If so, does the strategy need articulating better. Could my concerns be resolved by way of changes made through, and as the result of discussions at, the hearing sessions? Alternatively, is further work needed to resolve these matters?

I await your comments. In the meantime I shall otherwise be commencing more detailed work in the New Year, reflecting a provisional programme of a Pre Hearings Meeting late January/early February and hearing sessions in late March/early April. One option available to me is the calling of an early Exploratory Meeting to enable a discussion of these issues, to try and reach an early resolution of the matters raised.

I look forward to an early reply.

A handwritten signature in black ink that reads "David Fenton". The signature is written in a cursive style with a large, stylized 'D' and 'F'.

David Fenton  
Inspector