

**City Development**  
Planning Policy

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*Date:* 19<sup>th</sup> December 2008  
*Your reference:* PINS/G3110/429/5  
*My reference:* Core Strategy (Submission)  
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Dear Steve

Thank you for your letter of 15<sup>th</sup> December 2008, incorporating a letter from the Inspector appointed to examine the soundness of the Oxford Core Strategy. Set out below are the City Council's early comments on the issues raised in that letter. I would be grateful if you could forward this reply on to the Inspector.

**OXFORD CORE STRATEGY 2026 – SUBMISSION DOCUMENT**

Thank you for alerting the City Council at an early stage to your concerns regarding the submitted Core Strategy. This letter seeks to provide an initial explanation of why the document has been produced in the form that it has, as well as expressing the City Council's views on the best way forward.

Deferment to subsequent plans

You have indicated that your fundamental concern is the degree of deferment of decisions to subsequent plans. In this regard, it is recognised that the City Council is proposing to produce a significant number of follow-up documents. Our LDS for 2008-11, recently approved by GOSE, includes provision for four further DPD's and four SPD's. This reflects the City Council's positive approach towards the LDF process, and our desire to deliver high-quality plan-led development that will benefit the city.

Our aim from the outset has been to produce a short, succinct Core Strategy that would be easy to read and sharply focused, providing the strategic context for the more detailed follow-up documents. At the time we started preparation of the Core Strategy, this seemed to us to be very much in line with the flexible, 'portfolio' approach advocated in the 2004 version of PPS12. Advice from GOSE and others at seminars indicated that local planning authorities should aim to produce succinct core strategies of some 30-50 pages.

During the preparation of the Core Strategy, guidance and practice has evolved and we are aware that many other local planning authorities are now producing more detailed core strategies with a smaller number of subsequent documents. We have

sought to adapt our approach to reflect emerging guidance as we have gone through the process, but we have had to strike a balance in this, as it did not seem appropriate to us to substantially alter the form and structure of the Core Strategy at a relatively late stage in its preparation. We have also been mindful of the encouragement from CLG and GOSE to make timely progress with our Core Strategy.

Notwithstanding our desire to produce a concise plan, we believe that the most important and 'difficult' decisions are taken by the Core Strategy. For instance, it was apparent early on from the emerging evidence base that it would not be possible to accommodate all Oxford's development needs up to 2026 through continued infilling and small sites. The City Council therefore took the decision to identify options for development on strategic, mainly greenfield, sites. At the time our Preferred Options document was published (March 2007), the identification of strategic sites in core strategies was not a widely adopted approach. Having undertaken considerable consultation, in large part a broad level of consensus has emerged about the location of major development in the city.

The City Council has also had experience through the West End Area Action Plan of the value of AAP's as the best way to drive regeneration in partnership with other stakeholders. We therefore made a conscious decision not to try to deliver important regeneration through the Core Strategy alone, or through the Core Strategy and an SPD. While such an approach may be suitable in market towns or smaller urban centres, we consider that it does not suit a city authority like Oxford with detailed issues that need resolution through an AAP approach.

While it is recognised that the submission document includes a number of references to subsequent plans, we feel that the policies do what they need to do at the strategic level. The references were included with the intention of providing a helpful guide to the reader about how, where and when the Core Strategy proposals would be implemented, rather than a deliberate attempt to defer making important decisions.

#### Level of detail

You raise a number of concerns about the general nature of the objectives and policies, the lack of added value being established beyond national guidance, and the consequent difficulty in establishing meaningful indicators and targets. As indicated above, our approach has been to pursue a concise Core Strategy. We have therefore sought to avoid including lengthy or prescriptive detail that might have the effect of making the document date quickly, or reducing the flexibility to respond to changing circumstances.

We have, of course, sought not to merely repeat national guidance, and in addition to the strategic locations section of the plan the strategy includes many aspects that are of particular relevance to Oxford (such as reflecting the important role of the hospitals and universities in the city). Inevitably, however, there are some policies that are equally applicable to all parts of the city, or where a finer level of detail would not sit comfortably in a strategic document. Furthermore, some key delivery partners and stakeholders have made representations asking that relevant policies more closely reflect national policy (for example, the Environment Agency with respect to Policy CS13 – Flooding).

When preparing the proposed submission document, part of our concept was to include much of the factual evidence underlying the plan in a series of background papers that were published alongside the main document for the reasons of conciseness and flexibility mentioned above. The background papers contain much more detail and perhaps, in some respects, a clearer articulation of the City Council's strategy for issues such as employment and retailing. Given that this information has already been made available for consultees, we believe that it should be possible for some of this detail to be incorporated within the main document if you were to reach the view that this would improve the clarity or soundness of the plan. We would be happy to discuss this with you further.

#### Local distinctiveness and vision for main areas

With regard to your concerns about this issue, it is important to bear in mind that Oxford is a relatively compact city with a tightly drawn administrative boundary. Many of the neighbourhood areas identified on the map on page 8 of the submission document are very small, often without a significant centre, and they are generally interlinked with each other in terms of access to services and employment.

Due to the difficulty of making meaningful distinctions between such areas, we did not consider it helpful to have a vision for each neighbourhood area. Instead, we felt it more relevant to identify particular areas of change, such as district centres and regeneration areas. The district centres in particular impact upon adjacent areas of the city. Cowley Centre, for example, draws people from the whole of southeast Oxford and so Policy CS2 seeks to deliver the vision for Cowley Centre by designating it a primary district centre.

Many issues, such as the need for affordable housing, are the same across the whole city, and we therefore felt that it would be artificial to make spatial distinctions in the application of such policy. Nevertheless, we have sought to include spatial elements in the citywide policies where we felt there was a clear rationale for so doing, e.g. the transport policies (CS15 and CS16).

Notwithstanding the above comments, we recognise that the proposals in the Core Strategy will have particular implications for certain areas. If you feel that it would be helpful, we would be happy to pull together the different policy themes to illustrate their effects on particular spatial areas. We consider that this could be undertaken in a fairly short timescale, based on information that is contained within our evidence base studies and background papers as well as the main document itself.

#### Infrastructure and regeneration

A background paper on infrastructure was published alongside the proposed submission document, which provides a broad preliminary indication of infrastructure needs arising from the spatial strategy. It is recognised that, ideally, there would be a more detailed assessment of the range of infrastructure requirements arising from the development proposed in the Core Strategy. However, close working with key delivery agents has demonstrated that it would not be possible at this stage to realistically assess with precision all the specific infrastructure types and quantum that may be needed, given the divergent priorities, timescales and resources applicable to the various bodies. The City Council is nevertheless committed to

partnership working on delivery of the necessary infrastructure in a timely manner, as reflected in the policies and text of the Core Strategy.

With regard to the regeneration areas, this is a clear corporate priority and work has begun on a Regeneration Framework Strategy for Oxford. This will identify the regeneration challenges facing the city, using an evidence-based approach. The Framework is being developed with local and regional partners, therefore it would be premature to set out in detail in the Core Strategy the specifics of what this might entail, over and above the headline guiding principles. It is worth highlighting that in the last few days the City Council has been allocated significant funding from the Government's Growth Points programme, and has received confirmation from the Homes and Communities Agency that it will provide financial support to bring forward the Barton strategic site, linked to the regeneration of the Barton and Northway estates.

We would also comment that Oxford's status as a Regional Hub demonstrates its inherent sustainability as a location for development, in terms of its existing strategic and service infrastructure, therefore requiring less additional infrastructure compared with similar levels of development in less urbanised locations.

#### Pointers to the evidence base

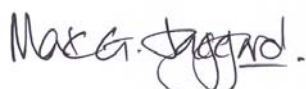
As you have recognised, we did submit a substantial evidence base which fed into the development of the policies, but we made a conscious decision not to reference particular documents within the Core Strategy in order to avoid the document becoming quickly dated. In some cases we have referred to strategies where the title is generic enough not to date, for example, on page 51 we refer to the Culture Strategy and Leisure Strategy. We have made sure that we extensively referenced the evidence base in the background papers so as to make clear how the evidence has influenced the approach adopted.

#### The way forward

In light of the comments above, our initial view is that your concerns could be resolved by a clearer articulation of the City Council's strategy in respect of some aspects of the plan, or perhaps by some limited additional work based on existing sources of information. In suggesting this as a way forward, we would ask you to take into account the fact that a considerable amount of work has gone into the Core Strategy, including the formulation of a substantial evidence base, and that, in large part, a broad measure of consensus has emerged about the preferred spatial strategy for the city.

Subject to your consideration of the above comments, we would be happy to have an Exploratory Meeting early in the New Year to discuss these issues in more detail.

Yours sincerely



**Mark Jaggard**  
**Spatial and Economic Development Manager**