

City Development
Spatial and Economic Development

Mr S J Pratt BA (Hons) MRTPI
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Date: 3rd March 2010
Your reference:
My reference:
Please ask for: Mark Jaggard
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Dear Mr Pratt,

Oxford Core Strategy

I refer to my letter of 19th February 2009. Thank you for enabling a full and fair exploration of the various issues and points of view relating to the completion of the Oxford Core Strategy examination, during the Procedural Meeting held at Oxford Town Hall on 9th February 2010.

You have asked Oxford City Council to outline a suggested timetable and programme, including any further work. You indicated that you would consider this when deciding how to progress the examination in advance of the resolution of the legal challenges to the South East Regional Spatial Strategy (RSS).

The City Council has given serious consideration to the issues raised at the Procedural Meeting. In particular, we have considered the issues that you flagged up towards the end of the Procedural Meeting, which are listed in paragraph 7.50 of the notes of that meeting. I have set out below, in the order listed, how we intend to deal with each of those issues.

In summary, the City Council would wish you to conclude the Oxford Core Strategy examination on the basis that we will provide a minimum of 8,000 homes within Oxford over the plan period. We would ask that you assume, for the purpose of the examination, that no homes would be provided on the South of Oxford Strategic Development Area (SOSDA) during the plan period.

1. The housing/employment balance (including the basis for the figures used)

The Oxford Core Strategy was based on a minimum 8,000 houses being delivered in Oxford over the plan period. The Annual Monitoring Report (AMR) 2009 identified that in the first three years of the Core Strategy and RSS period, just over 2,000 homes had been built.

In our response to you in November 2009, we provided an analysis indicating that there would be no material worsening of the jobs-housing balance (expressed as a ratio) over the plan period

based upon the forecast housing and employment growth without SOSDA. On a low employment growth scenario, the balance would materially improve.

We consider that, in the context of Oxford as a whole, the implications of the deletion of SOSDA on the jobs/housing ratio are relatively limited. Nevertheless, we recognise that this is an important issue that may require some additional clarification, and thus examination. If you agree with the process outlined later in this letter, we would publish an updated version of CD16/54 (which sets out suggested examination changes to Section 3.4 of the Core Strategy: Meeting Oxford's housing and employment needs) as part of the schedule of changes.

We would also publish a summary of previous analysis carried out on the jobs/housing ratio, to support further consultation, and to clarify the basis of the figures used.

The City Council considers that an additional hearing session may be appropriate to further examine this issue, in the light of the expected deletion of SOSDA from the RSS in order for you to test the impact this may have.

2. The overall provision of housing/employment development

In terms of overall housing provision, the Core Strategy plans for the delivery of a minimum of 8,000 dwellings, but the actual SHLAA forecast (December 2009) now indicates that this amount should be exceeded at just over 9,000 dwellings (including windfalls). The deletion of the SOSDA from the RSS does not affect our Core Strategy's ability to deliver the 8,000 dwellings nor does it prevent the target being exceeded. The City Council does not propose to make any changes to Policy CS23 (Level of Housing Growth).

The City Council will review the anticipated phasing and delivery of employment development as part of the schedule of changes. This will entail a review of the information provided to Mr Fenton during the examination in CD16/53 and CD16/55 (relating to Core Strategy Section 8.1: Employment and Section 3.5: Place-shaping local areas of Oxford) to ensure that it remains up to date. In addition further analysis will be published regarding the amount, mix and phasing of development on the Northern Gateway and the implications for the balance between housing and jobs, the broad content of which is set out in response to issue 3 below. It should, however, be noted that the Northern Gateway AAP will consider the precise mix, and the AAP examination will allow this to be independently tested. It is not envisaged that we will propose any changes to Policy CS28 (Sustainable Economy).

3. The implications for the Northern Gateway (possibly other sites) including the scale, nature, mix, extent and phasing of land-uses, particularly housing and employment

The City Council would support setting a maximum ceiling for the amount of Class B floorspace at the bottom of the range set out in Policy CS6, i.e. at 55,000 m², to be delivered in the Core Strategy period to 2026. It is understood that the Northern Gateway Consortium would be agreeable to this.

In light of the Northern Gateway Consortium's view that a higher number of housing units could be delivered to further improve the overall jobs-housing balance, the City Council considers that this should be set at 200 dwellings. Any further increase in the number of dwellings could be explored through the consideration of a range of options at the Area Action Plan stage.

In relation to the phasing of the development this could be explored further. Whilst the residential element and complementary uses would not require phasing as such, the Class B employment floorspace could come forward in two phases. The first phase could set a maximum amount of 20,000 m² to 2016, with a maximum of 55,000 m² by 2026.

You may consider these changes and phasing could beneficially be discussed at a hearing session.

The City Council does not consider there are implications for other sites.

4. The implications on the regeneration and development of Blackbird Leys and Cowley Centre

The City Council is committed to the regeneration of Blackbird and Greater Leys, and is progressing with regeneration work including the production of an Area Regeneration Plan (which is being undertaken by Savills/Oxford Brookes University at the present time, with funding from the HCA).

The City Council had expected that SOSDA would bring benefits for the regeneration of Blackbird Leys and Greater Leys. While the failure of SOSDA to come forward within the Plan period would be disappointing in that regard, it would not undermine these proposals (which were part of the strategy prior to the addition of SOSDA).

It is still considered that Cowley Centre is well placed to serve an enhanced role in the hierarchy of centres, even without SOSDA, as evidenced by the submissions to the Core Strategy examination from both landowners at the Cowley Centre. Again this proposal was part of the strategy prior to SOSDA.

The City Council considers that this issue does not require additional consideration.

5. The issue of general conformity with the South East Plan RSS following the legal challenges

The South East England Partnership Board (SEEPB) confirmed at the Procedural Meeting that the revised submission Core Strategy was in general conformity with the RSS. SEEPB also stated that they anticipated that the Core Strategy (without reference to SOSDA) would still be in general conformity with the RSS, as amended following the legal challenges. The City Council does not believe that deletion of SOSDA would lead to any lack of general conformity with the RSS.

6. In relation to the 4,000 dwellings originally allocated to the SOSDA – what happens to them, where would they be accommodated

At this stage it is not possible to say with any certainty what will happen to the 4,000 dwellings allocated to SOSDA and where they would be accommodated. We think that while there may be different consent orders published, there is every possibility that they may have to go back to the High Court for determination. The final decision will be taken by the Government at the regional level at a time as yet unknown.

In the circumstances, the City Council is of the view that the examination should proceed on the basis of the allocation of 8,000 dwellings for Oxford, and no reference to the 4,000 homes which had previously been allocated to SOSDA.

If, as a result of the legal challenges or the Government's subsequent refresh of the RSS, it becomes appropriate to carry out a partial review of the Core Strategy, this will be undertaken.

7. Possible policy review to accommodate this housing in Central Oxfordshire, and the possible need to review the Green Belt around Oxford

As with issue 6 above, this is an issue that cannot (indeed should not) be anticipated at present and we consider it is neither necessary nor desirable to hold up the Core Strategy to await the outcome of any possible policy reviews. Therefore this should be regarded as a matter that lies outside the scope of the Oxford Core Strategy.

If necessary, we would carry out a partial review of the Core Strategy to reflect the outcome of any potential review of the RSS that had significant implications for Oxford.

8. The need for any contingency arrangements to be included in the Core Strategy

Whilst the 4,000 dwellings from the SOSDA would have helped meet some of the housing need of Central Oxfordshire, it was always in addition to Oxford's own target of 8,000 dwellings. The Core Strategy includes policies to meet Oxford's target of a minimum of 8,000 dwellings but also gives sufficient flexibility to accommodate the current housing projection of around 9,000 dwellings. The Summertown contingency site also has the potential to add 200-500 dwellings to this total.

However, Oxford City does not have the capacity to absorb significantly more housing, a point recognised in the Panel Report on the draft RSS (August 2007). The Panel stated, at paragraph 22.61, "we believe there are limits to the extent that significantly more development could be accommodated within the urban fabric, without damaging the special character of the city and putting pressure on its green spaces."

You will be aware that we had previously suggested possible contingencies in relation to the phasing and mix of development at the Northern Gateway. These have been addressed above in our response to issue 3. We do not consider that any further contingency measures are required and we are not proposing to make any additional changes on this matter.

9. The issue of the need for any further consultation and sustainability work

It is proposed that the schedule of further changes (incorporating the deletion of references to SOSDA and changes relating to housing/employment balance and the Northern Gateway mentioned above) will be subject to a full public consultation. This will be specifically focused on the changes now proposed, as a consequence of the deletion of SOSDA. We do not consider that further sustainability work is likely to be needed in respect of these changes, since we have already appraised the strategy with and without SOSDA and the conclusions of the SA addendum at the Further Preferred Options stage (March 2008) are fit for purpose for this stage too.

We are aware that some people involved in the examination have expressed confusion about the number of changes that have been made to the Core Strategy. For the avoidance of doubt, I have enclosed as an annexe to this letter a list of the examination changes that were put forward by the City Council, and in some cases by other parties, during the hearing sessions held by Mr Fenton. These have all been available to view on the City Council's website for many months and were circulated to the other participants at each of the relevant hearing sessions by the Programme Officer.

Summary of the City Council's views on the way forward

In summary, the City Council would ask you to work towards concluding the Core Strategy Examination on the basis of Oxford's housing allocation being 8,000 dwellings (as set out in the current version of the RSS), and using the assumption that neither SOSDA, nor any allocation of the unallocated 4,000 dwellings resulting from the deletion of SOSDA from the RSS, will come forward within the plan period.

While the City Council has strongly supported SOSDA, it is certainly possible to proceed without it. SOSDA was outside Oxford's administrative boundary and independent of Oxford's housing targets in the RSS.

Should SOSDA fail to come forward, this would be disappointing but nonetheless we recognise that planned housing elsewhere in Central Oxfordshire, such as at Didcot and the North West Bicester Ecotown (itself not in the RSS), will undoubtedly make a contribution to meeting Oxford's housing needs over the plan period. The main reason why the City Council supported SOSDA is that, in our view, an urban extension to Oxford is a more sustainable option than directing further growth to the County Towns because of the inherent sustainability advantages of Oxford as a location for development.

For the avoidance of doubt, should the Government's review of the RSS following the legal challenges to the RSS result in an increase to the housing allocation for Oxford, or a major urban extension in the Green Belt adjoining the city boundary, then the City Council will swiftly bring forward a partial review of the Core Strategy. You will note that, in its work on the housing/employment balance, the City Council had always assumed that SOSDA would most likely come forward post 2016.

Suggested programme

The City Council would hope that the following indicative timetable could be achieved. It is acknowledged that this is a best case scenario, which reflects internal legal advice that we can proceed with further consultation during the period leading up to and including local elections, and potentially a General Election.

We would note that the hearings could be brought further forward, should you be minded to incorporate your Matters and Issues (questions to be answered at the Examination) with the consultation on changes to the document. This would remove the period required for submission and consideration of statements. This would mean that any Examination days could be held in the week beginning 21st June.

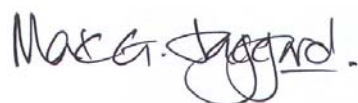
The timetable below takes into account the availability of a suitable room in the Town Hall for the hearing sessions.

Date	Action
19 th February	Council submits interim comments to Inspector
By 3 rd March	Council submits full response to Inspector
By 12 th March	Inspector's response received
By 2 nd April	Subject to Inspector's response, Council to prepare further changes
9 th April	Consultation begins
21 st May	Consultation closes (6 weeks later)
By 28 th May	All consultation responses available on the Council's website and in the examination library
By 4 th June	Inspector produces Matters and Issues
By 25 th June	Participant's statements submitted
w/b 12 th July	Hearings recommence

I hope this answers any questions you had outstanding following the procedural meeting, and that you now feel able to agree a way forward with the Examination. The City Council would like the Examination resolved as a matter of urgency so that we can move forward with key housing and regeneration projects, such as Barton and Blackbird Leys without there being a policy vacuum. We feel there is less risk in proceeding on the basis of what we do know at the present time, than in holding the Core Strategy in abeyance pending a regional/national decision that is not yet programmed.

Thank you for your assistance.

Yours sincerely



Mark Jaggard
Spatial and Economic Development Manager

Annex

Summary of the examination changes proposed to the Core Strategy

Core Document reference number	Publication date	Subject
CD16/53	27 th July 2009	Proposed amendments to Section 8.1 (Employment land supply)
CD16/54	27 th July 2009	Proposed amendments to Section 3.4 (Balance between homes and jobs)
CD16/55	27 th July 2009	Proposed amendments to page 53 (Place shaping)
CD16/57	27 th July 2009	Proposed amendments to Section 7.3 (Affordable Housing)
CD16/58	27 th July 2009	Proposed amendments to Section 9.2 (Monitoring)
CD16/59	27 th July 2009	Proposed amendments to schools wording
CD16/60	27 th July 2009	Proposed amendments to Section 3.4 (Summertown)
CD16/61	27 th July 2009	Proposed additions to the Proposals Map