

Oxford Core Strategy Examination

Summary of representations received on Further Proposed Changes to the Submission Core Strategy and Supporting Information

4th June 2010

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1. Introduction

1.1 What is this document?

This document is a summary of the representations received following publication of the Oxford Core Strategy Further Proposed Changes to the Submission Core Strategy and Supporting Information ('the FPC document'). The purpose of this document is to set out:

- how many representations were made on the FPC document;
- the organisations and groups who made representations;
- a summary of the main issues raised in the representations.

2. Publication of Further Proposed Changes to the Submission Core Strategy

2.1 Introduction

The FPC document introduction sets out the purpose of this consultation. In short, the consultation invited representations on the FPC document. This consisted of four parts:

1. An update on housing and employment growth forecasts and the jobs/housing balance;
2. A schedule of further examination changes made as a result of the legal challenge to the South East Plan as relates to the South of Oxford Strategic Development Area (SOSDA);
3. The Council's response to issues raised by the Examination Inspector (in his letter dated 18th March 2010);
4. An Addendum to the Habitat Regulations Assessment.

In agreeing to this consultation, the Inspector made clear in his letter of 18th March that representations should only address the Further Proposed Changes to the Core Strategy and accompanying documents, with no need to repeat points made previously. The Council also made this clear in the FPC document introduction.

2.2 Who was notified?

Further Proposed Changes to the Submission Core Strategy were published on Friday 9th April 2010, and representations were invited over a six-week period closing on Friday 21st May 2010. Given that this consultation took place within the Examination at a late stage in the Core Strategy process, the City Council did not undertake the type of community

engagement methods (such as exhibitions, workshops and drop-in sessions) that were carried out at earlier stages of developing and refining options. This is in line with the Statement of Community Involvement, which sets out the types of consultation undertaken at different stages of producing Development Plan Documents (DPD's).

However, letters were sent out to all the organisations and individuals on the City Council's database. All those invited to participate in the examination hearing sessions were notified. A total of 1079 emails and 1067 letters were sent (excluding specific consultation bodies). Copies of the FPC document, and relevant new or updated supporting documents, were published on the City Council's website and were sent to 44 specific consultation bodies identified in the Regulations. Copies of the documents were also available to view at various locations around the City, including each of the public libraries, throughout the period for making representations. A statutory notice was placed in the Oxford Times on 8th April 2010. A meeting was also organised by the Wolvercote Commoners' Committee at which planning officers ran through the document and answered questions about a range of issues, mainly connected with the proposed Northern Gateway strategic site.

2.3 How many representations were received?

Responses were received from 49 different organisations or individuals, of which seven indicated that they had no specific representations to make at this stage or that they wished to reiterate their previous representations. A total of 183 representations were made by the remaining 42 respondents. [Appendix 1](#) lists the respondents. [Appendix 2](#) gives a breakdown of the individual representations.

In the interests of transparency, the City Council decided to accept and publish in full all of the representations, even if they did not make points directly related to the Further Proposed Changes. This document indicates those representations which in the Council's opinion raise points that are not the subject of the Further Proposed Changes. Of the total number of representations, 45 are considered not to relate to these changes.

A small number of late representations were accepted (from South Oxfordshire District Council; Friends of Warneford Meadow; Bus Users UK Oxford Branch; Wolvercote Commoners Committee; and an additional email from Rosemary Harris). In the case of the Bus Users UK Oxford Branch and Wolvercote Commoners Committee, it appears that the representations were sent on time but were not received by the City Council.

2.4 Summary of the main issues raised in the representations

Set out below is a summary of the key issues raised in the representations, in the same order as the FPC document itself. Where respondents did not specifically identify which parts of the FPC document they were commenting on, the City Council has sought to match their representations to the most relevant sections of the document.

Part 1 Update on housing and employment growth forecasts and the jobs / housing balance

Section A – Housing forecast update (SHLAA UR1b)

Section A provided an update on housing forecasts, as set out in the Annual Monitoring Report 2009 (AMR) and the Strategic Housing Land Availability Assessment (updated December 2009).

7 representations were received on this part of the FPC document, covering the following main points:

- whether it is right to use the SHLAA to look at the supply of housing land, rather than use the South East Plan target of 8,000 houses;
- the Northern Gateway should be assessed as having capacity for at least 500 dwellings;
- the reference to a target of 8,000 houses requires either revision or further justification given the pending abolition of the South East Plan;
- the suitability of housing sites on Green Belt land off the A40 at Northern Gateway has not been properly considered;
- the revised housing forecast makes it clear there is no case to build on Green Belt land before 2026.

Section B - Update on workforce growth estimates

Section B explains how future increases in Oxford's workforce have been estimated. An updated estimate is then calculated, based on the latest forecast for housing growth in the City as described in Section A, which excludes the 4,000 dwellings at SOSDA.

7 representations were received on this part of the FPC document, covering the following main points:

- If a housing growth forecast of 8,000 were applied to the methodology used, 10,205 additional economically active persons would result;
- the predicted household size in 2026 should be applied to the whole population of Oxford, not just the new housing (example given: this alternative assumption would result in net additional economically active population of 4,052 compared with 11,649)
- the predicted average household size of 2.38 by 2026 is above that predicted by Oxfordshire County Council which is 2.26 – applying this figure would result in an economically active population some 5% lower;
- there is no justification for assuming that the economic activity rate will remain fixed for 20 years. It is more likely that this figure will fall given an ageing population;

- the 2001 Census stated an average household size for Oxford of 2.32. This is likely to have already decreased due to the high number of 1 and 2 bedroom units completed since 2001. The forecast figure of 2.38 used by the City Council for 2026 is therefore too high;
- the Oxfordshire population and household forecasts produce lower estimates of future population and economically active persons;
- it is important to understand the scale of imbalance between jobs and housing in absolute numbers, in relation to traffic congestion.

Section C – Employment land update

Section C provides an update on employment land supply and development, taking account of evidence submitted during the Examination and annual monitoring (as reported in the City Council's Annual Monitoring Report 2009).

11 representations were received on this part of the FPC document, covering the following main points:

- estimates of employment based on take-up of existing available land are highly questionable, and were drawn up at the end of a period of unsustainable economic growth;
- the analysis has not fully taken into account the impact of the recession;
- the forecast time period for building out the Oxford Science Park takes a worst-case scenario; if a higher take-up rate of 4,600m² per year were used, this would result in the site being built out by 2016;
- there is no reasoned justification for the revised floorspace figures at Northern Gateway;
- the document still does not demonstrate the need for substantial increases in employment land in Oxford;
- the document shows that the period for building out existing employment sites, e.g. the Business Park and Science Park, is likely to be too long to justify identifying Northern Gateway for employment development in the Core Strategy period;
- figures for Oxford Business Park fail to mention that a number of units on site have been sold or remain unoccupied (this should be recorded in the AMR and FPC document);
- it seems highly likely that take up rates at other City locations (in addition to the Science Park) will slow, therefore land for employment development will be available later in the Plan period;
- land at the Business Park and the Science Park is used inefficiently, e.g. for car parking. More employment development could therefore be located on these sites;

- question reliance on data relating to the Oxford Science Park being obtained from Savills, a land agent with vested interests.

Section D - Update on employment growth estimates

Section D explains how the increase in jobs in Oxford has been calculated. An updated estimate has been calculated, based on the revised position accepting a ceiling on office-type development at Northern Gateway at the lower end of the original range, and a revised forecast take-up rate at Oxford Science Park.

6 representations were received on this part of the FPC document, covering the following main points:

- the statistics on forecast employment growth are out of date, and fail to take account of the impact of the recession;
- the analysis does not take into account the impact of home working and the reduction in requirements for extra floorspace;
- a far lower forecast for jobs than suggested should be expected in the future, given all the current difficulties in the national economy and since a large proportion of Oxford's employment is in the public sector;
- question the assumption that 2,200 additional jobs could be delivered by 2016 through the modernisation and redevelopment of existing employment sites;
- job delivery in the West End is likely to be spread over a longer time period than suggested by these forecasts;
- the forecasts do not appear to take account of jobs created as a result of development between 2006 and 2010;
- not all key protected employment sites have been included in the figures for estimated job growth from modernisation/redevelopment;
- the City Council's estimates for the number of jobs is too conservative, taking into account the most recent Annual Business Inquiry data and AMR 2009 data on employment floorspace completions;
- the estimates do not include jobs in tourism resulting from the Destination Management Organisation, or the forthcoming expansion of Oxford Hotel, with 70 new guest bedrooms and a proposed new conference room.

Section E – Revised analysis of jobs/housing balance

Section E shows an updated analysis of the jobs / housing balance, in light of the updated evidence in Sections A and C, and to reflect the probable deletion of SOSDA from the South East Plan.

6 representations were received on this part of the FPC document, covering the following main points:

- although the ratio shows a reduction, in absolute numbers there is an increase in the excess of jobs over workforce by 2026 under the ‘high job growth’ scenario. The low growth scenario shows a reduction of only 369. Consider the jobs/housing imbalance can only be addressed by limiting growth in employment in Oxford;
- the analysis is flawed as it is based on questionable assumptions. It should therefore be revised – such a revision is likely to show a worsening of the ratio;
- if the jobs to worker ratio fails to improve or worsens, there will be consequences for neighbouring districts. For example, there is less likelihood that the self-containment of other towns in Oxfordshire will improve, and it will potentially impede delivery of growth in Science Vale UK;
- if more jobs are created in Oxford than the increase in economically active persons, these jobs will have to be filled by people outside the City. This will increase congestion on roads in the City and in other districts in Oxfordshire;
- the figures are finely balanced and vulnerable to many factors, e.g. economic recession, reduced space requirements or the initiatives of surrounding district councils to improve their jobs to housing ratio;
- some details of Tables 3 and 4 are questioned, e.g. housing sites in SHLAA UR1b that have been granted planning permission for other uses, and inconsistencies in the current numbers of jobs in Oxford compared with other sources.

Part 2 Schedule of changes

The schedule lists the changes which the City Council considers would be necessary should SOSDA be deleted from the South East Plan as a result of the current legal challenges to that Plan, together with other consequential changes primarily relating to the employment/housing balance and the updated information on employment and housing growth set out in Part 1 of the FPC document.

39 representations were received on the schedule, of which 12 related to FC6 and FC7 (Northern Gateway) and seven related to FC5 (new text on the housing/employment balance). The main issues raised are highlighted below:

Various FCs relating to deletions of SOSDA references

- support pragmatic approach of removing references to SOSDA from the Core Strategy;
- PINS guidance states that a site is strategic if the delivery of the Core Strategy is dependent on it. It is not possible to delete a strategic site without finding the whole Core Strategy unsound.

FC1 – Key Diagram

- Key Diagram should show priority accessibility improvements taking place on the access roads to Northern Gateway. Access to Oxford road improvements should be made a pre-condition for any development;

- Proposed area of search for Barton development should not include part of Headington Conservation Area immediately south of the A40.

FC5 – 3.4 Meeting Oxford’s Housing and Employment Needs

- proposed text gives confusing picture of the implications of an improving jobs to housing ratio, as a falling ratio does not necessarily mean a reduction in the number of people commuting. The absolute numbers of both jobs and economically active residents are projected to rise substantially;
- the figures and analysis set out in these changes are flawed. A revised analysis is likely to show a worsening of the jobs to housing ratio;
- there should be a further reduction in the job growth ceiling at Northern Gateway.

FC6 and FC7 – 3.4 Northern Gateway

- despite the further changes, Northern Gateway proposals remain wholly unjustified;
- under ‘Key Outputs’ (sixth bullet point) and within the policy, complementary uses should refer to providing a minimum of 500 residential units not 200;
- in relation to change to wording on housing units, consider that location would be unsuitable and remote, especially for lower income households;
- concern over how proposed housing could develop into a sustainable community, and lack of reference to the need for supporting services and facilities;
- the lack of phasing for 200 dwellings at Northern Gateway creates difficulties in planning for education provision, especially for primary school places;
- if the Inspector is minded to allocate the Northern Gateway, suggest policy and supporting text is amended to stipulate that development for Class B1 uses will provide for employment needs after 2016 and will be phased to provide employment opportunities beyond the Plan period (unless monitoring suggests otherwise);
- reference to establishment of a range of retailers at Northern Gateway ignores the damage this could do to shops at Wolvercote, Kendall Crescent, Summertown and the City centre;
- reference to ‘complementary amenities’ is too vague; these would have a large impact on congestion, pollution, wildlife, etc.;
- unclear on justification for relocation of the emergency services to the Northern Gateway.

FC8 – 3.4 South Oxford Strategic Development Area (SOSDA)

- the deletion of references to SOSDA are premature pending finalisation of the RSS process. Deletion of the policy in relation to SOSDA prejudices the outcome of that process.

FC10 – 3.5 Place Shaping

- proposes 541 new dwellings and 3,110 new jobs in Summertown District Area by 2026. Safeguarded land in Summertown is unsuitable for development, and very little land is available for employment in Summertown. The proposed figures would result in gross overdevelopment of the district centre.

FC19 – 8.1 Economy

- should be further amended to reflect the full wording of South East Plan (paragraph 22.7), i.e. clarity that achieving an improved balance applies to Oxford in its own right as well as across the sub-region as a whole;
- South East Plan does not require Central Oxfordshire's employment growth to be in Oxford either. Oxford has no direct obligation to provide for job growth.

FC20 – Forecast demand and future growth

- it is unnecessary to have any reference in the Core Strategy to a hypothetical future urban extension, which would be outside the City's boundaries.

FC28 – 9.2 Monitoring

- in amendment to monitoring target relating to CS6 – Northern Gateway, amend figure relating to new homes delivery to “provision of 200 new dwellings (by 2016)”; “provision of a minimum of 500 new dwellings (by 2026)”.
- unclear why references to siting emergency services at Northern Gateway have been retained. Latest indications are that no emergency services currently seems likely to move there (same point for FC32).

FC33 – Appendix 4

- oppose reference to housing in the Green Belt.

Part 3 Response to issues raised by the Inspector

This section of the FPC document sets out the City Council's response to points raised by the Inspector in his letter of 18th March 2010. The key issues raised in the representations are summarised below:

Issue A: The implications for the overall provision of housing and employment Development

6 representations were received, covering the following main points:

- need to limit employment and housing growth to be compatible with the outstanding character of the built environment and green spaces of Oxford;
- endorse view of Oxford City Council that deletion of SOSDA from the RSS does not affect the Core Strategy's ability to deliver the 8,000 dwellings required at Oxford, nor does it prevent the target from being exceeded;
- Oxford should contain itself within its boundaries and maintain some spare land for future flexibility;
- to enable better understanding of this issue, tables should be provided that show how a target of 8,000 homes affects the jobs / housing balance, and also to reflect the economic climate;
- it will be hard to demonstrate exceptional circumstances exist for locating 200 homes in the Green Belt given that SHLAA UR1b forecasts over 9,000 dwellings compared with a housing target of 8,000;

Issue B: The overall housing/employment balance, including the basis and justification of the figures and calculations used

8 representations were received, covering the following main points:

- consider that balance between jobs and housing needs to be improved throughout the Plan period. However, this is not shown in the FPC document;
- lack of any alternative to SOSDA would render the spatial strategy unsound, due to the need to address housing need;
- do not accept that Oxford's role as a regional hub means that the existing high level of commuting is justified;
- the inclusion of specific information on the jobs/housing balance in the Core Strategy is welcomed;
- oppose in principle the suggestion that a degree of imbalance between jobs and housing is inevitable in Oxford, and reject comparisons with Reading;
- the deletion of SOSDA alongside proposed retention of employment development at Northern Gateway exacerbates arguments that Northern Gateway contravenes PPG13, and perpetuates the jobs / housing imbalance;
- the deletion of 4,000 homes at SOSDA should be met with a corresponding reduction of 5,000 of the planned jobs in Oxford, and consideration of housing needs generated by expansion of the Westgate centre;
- the conclusions of the jobs/housing analysis are invalid, as the different bases for the various numbers is greater than the size of the trends being measured;
- consider that any improvement in the housing / employment balance is marginal.

Issue C: The implications for the Northern Gateway proposal (and any other relevant sites/proposals), including the scale, nature, mix, extent and phasing of land-uses, particularly housing and employment

20 representations were received, covering the following main points

- any increase in traffic at Northern Gateway would be unacceptable on top of existing traffic congestion, noise and air pollution. However this point remains unaddressed;
- FPC document appears to pre-empt decisions on the Northern Gateway Area Action Plan;
- Core Strategy should not defer important decisions to the Area Action Plan such as carrying out a small scale Green Belt review or increasing the housing at the Northern Gateway to 500 units;
- housing development would be inappropriate at Northern Gateway given pressure on school places at Wolvercote, traffic and access problems, implications for the Oxford Meadows SAC, and difficulty integrating into the urban fabric;
- impact on local primary schools is of particular concern, given inadequacies of demographic research by the LEA. The capacity and facilities of schools should more accurately relate to the needs of families, adjusting catchment areas as required and in time to make appropriate provision;
- do not consider that altering the phasing and reducing the size of development at Northern Gateway meet objections, given importance of area between North Oxford and Kidlington as a strategic gap;
- all complementary uses should be phased, in order to ensure that development is in synch with the needs of the local community;
- development would do nothing to improve the grim aspect of land around Peartree. At most some modest and well-landscaped housing might be appropriate;
- there is already provision for future development in this part of Oxford, at the Wolvercote Paper Mill. Building on this site would put additional pressure on local infrastructure;
- welcome reference to complementary residential development, and would support increasing provision to 500 residential units, which will enhance the sense of place, add vitality and sustainability to the Northern Gateway proposals, and accord with Government advice in PPS1, PPS3 and PPS4;
- there is no reasoned justification for a cap of 55,000m² of employment development. If the site has capacity for 80,000m²; it is not clear whether the proposal now excludes Green Belt land. Need to explore the land-use implications of the reduction in employment floorspace. Has the site area been scaled down pro-rata?

- it is not clear how the Council can enforce a maximum ceiling for development once development has started. Equally there is no means of constraining the number of employees that could work on the site;
- the total number of jobs at Northern Gateway is likely to be very much more than 3,000 when uses other than B1 are included, hence there will be more people wishing to access the site;
- Class B uses are intended to relate to Oxford's key sectors of science and technology research, hence employees are likely to come from a wide area and travel is bound to be largely by car;
- welcome reduction in employment development proposed and details of phasing, but remain unconvinced that local infrastructure can cope with development;
- the justification for setting the number of dwellings at 200 is arbitrary, and delivery timescales are uncertain with no detail of phasing;
- development should be phased to prevent oversupply of facilities and/or irreversible development decisions.

Issue D: The implications for the regeneration and development of Blackbird Leys and Cowley Centre

3 representations were received, covering the following main points:

- removal of SOSDA removes Section 106 contributions that would assist in regeneration of Blackbird Leys, which has implications for the Blackbird Leys proposals;
- consider that the extent of land allocated for development at Cowley centre is unrealistic without the additional population that would have resided in SOSDA;
- consider that Cowley centre has plenty of potential for regeneration without the additional housing at SOSDA;
- consider that SOSDA should have been developed as a community with its own range of supporting services, thus do not agree with first part of paragraph 3.16.

Issue E: The issue of general conformity of the Oxford Core Strategy with the South East RSS following the legal challenges

4 representations were received, covering the following main points

- suggest a housing target of 8,000 dwellings would be in conformity with the South East Plan;
- strongly contend that there is a real issue here and that is the overall balance between employment and housing;

- it is uncertain how the Government's announcement that it will abolish RSS's will impact on the conformity of the Core Strategy, and suggest the reason for the further examination hearings now appears redundant.

Issue F: The implications for the 4,000 dwellings originally allocated to the SOSDA, along with the implications for any review to accommodate this housing in Central Oxfordshire or elsewhere, including any possible need to review the Green Belt around Oxford

6 representations were received, covering the following main points:

- support conclusion of the examination on the basis that 8,000 dwellings are allocated to Oxford, with no reference to the additional 4,000 at SOSDA;
- support the view that any review of the Oxford Green Belt could be incorporated into a partial review of the Core Strategy, as could a subsequent re-instatement of SOSDA. Hence no further contingency is required;
- it is safe to assume that a general review of the Oxford Green Belt will not now take place, given the policy statements of the new Government;
- the proposed changes should include a contingency to cover the eventuality that the SOSDA is reinstated into the SEP.

Issue G: The need for any contingency arrangements to deal with the possible reinstatement of the SOSDA at a future date, including any contingencies to cover the phasing, mix and scale of development proposed at the Northern Gateway, and indications of what would trigger a review of the Core Strategy

4 representations were received, covering the following main points:

- support statement that the Council would bring forward a partial review of the Core Strategy should a refresh of the RSS require it. However it is imperative that any increase in Oxford's housing target can be accommodated without loss of sites suitable for purpose built student accommodation;
- reinstatement of SOSDA should be resisted as it would put too much pressure on Oxford's character;
- concern that a partial review of the Core Strategy could have further implications for the phasing, mix of scale of development at Northern Gateway and further Green Belt reviews;
- agree that the City Council should plan within its own boundaries and that no contingency is required to deal with possible reinstatement of the SOSDA.

Issue H: The need for any further sustainability appraisal work (including Habitats Regulations/Appropriate Assessment)

Only one representation was received, indicating that a revised masterplan would have enabled some meaningful judgements to be made about the Northern Gateway proposals.

Part 4 Addendum to Habitats Regulations Assessment

This section of the FPC document comprised an addendum to the Habitat Regulations Assessment, relating specifically to what impact housing at the Northern Gateway site may have on the Oxford Meadows Special Area of Conservation in terms of recreational pressures.

10 representations were received, raising the following points:

- Green Belt land at Northern Gateway should be retained. Urge deletion of references to development on the Green Belt land south of the A40 in paragraphs 4.3 and 4.6;
- object to reference to safeguarded land at Summertown falling within the urban village of Cutteslowe;
- this section contains a number of major factual errors about access points to Port Meadow. Pedestrian access is available via the Jubilee gate at the bottom of the canal bridge, and there is a car park at the Bathing Place off Godstow Road. Both are much close to the proposed housing, therefore increasing the potential impact on the SSSI. The section needs to be rewritten to reflect these facts;
- there is no reference to hundreds of new houses at the Mill site in Wolvercote.

Responses that raise points which are not the subject of the Further Proposed Changes

A number of respondents to the Further Proposed Changes consultation raised general points on the Core Strategy or planning policies more widely, rather than relating specifically to the contents of the FPC document. A total of 45 such representations were received, and these are summarised below:

- would like permanent improvements to public transport link between Rose Hill and Cowley centre;
- Town Green at Warneford Meadow and new Local Wildlife Site at Southfield Golf Course should be reflected on the Proposals Map;
- Core Strategy has not adequately analysed traffic flows, and is therefore not acceptable;
- recent consultation has been inadequate'
- issues of access between Barton and Northway/Marston;
- provision of social amenities in West Barton;
- the proposed area for the Barton West development is noisy and poorly located. Concerned about transport links and added congestion;
- the proposed changes have received no formal authorisation from the City Council. They are no more than officers' responses without political backing and

- concerned by the omission of much discussion of housing on the Land at Summertown;
- there is no evidence that the City Council has sought the view of a QC, as encouraged by the Inspector at the Procedural Meeting in February;
- with a new government in place and all the pressures for change it is time to go back to the drawing board and come up with a realistic forward-looking Core Strategy;
- there is no reference to the 'Evergreen 3' Chiltern Railways proposal for a new parkway station at Water Eaton, and the impact this could have on traffic congestion. Key Diagram should show proposed Water Eaton station;
- the impacts on the Air Quality Management Area, which now covers all of Oxford has not been taken into account;
- there should be acknowledgement that other districts' Core Strategies that have been recently published will have implications for sites;
- evidence base is now out-of-date due to changing economic circumstances and because of its age;
- land designated for allotment use, including disused sites, should remain reserved for allotments. The supply of allotments is failing to meet current demand;
- Brookes University is expanding too rapidly, and has swamped the Headington community like a cuckoo in the nest;
- Oxford's green spaces are of paramount importance. The SLINC status of important wildlife areas of the city should be maintained and strengthened;
- there should be provision for an open air free to use skate and BMX park;
- impact of savage cuts to public expenditure, and increases in transport costs, have not been taken into account;
- the need for such excessive growth should be questioned. Oxford should remain a small historic university city;
- cycling should be more heavily promoted in Oxford;
- concerned about the impact that so many houses would have on transport and managing the buses in the City centre;
- extra housing, if built, should include local amenities such as schools, shops, pub and cinema, to minimise travel;
- consider that population will go up, and it is a good idea to build as many houses as possible;

- brownfield site development and sub-division of existing properties should be encouraged ahead of greenfield development;
- concerned that Inspector Fenton's report has not been made available to the public;
- retail floorspace should be limited close to current levels. The Westgate Centre redevelopment should be revised to stay within this limit and to allocate as much of the site as possible to housing;
- there should be a policy to encourage hospital and university development away from east Oxford;
- comments on deliverability of orbital bus routes and Cowley branch line transit;
- it is incorrect to say that Cowley centre has good accessibility by all modes of transport;
- local infrastructure is unlikely to be able to sustain the Wolvercote Paper Mill development. It is hoped the Mill site development will include some local employment.

Appendix 1 – Responses received in alphabetical order

A J Schiff, submitted via Inovem

Bus Users UK Oxford Branch, email and enclosure dated 21st May 2010

Campaign to Protect Rural England, email and enclosure dated 21 May 2010

Councillor Jean Fooks, email dated 21 May 2010

Councillor John Goddard, email dated 19 May 2010

Councillor Nuala Young, email dated 21 May 2010

David Fyson, submitted via Inovem

Elizabeth Sheppard, submitted via Inovem

ENGAGE Oxford, email and enclosure dated 21 May 2010

English Heritage, email and enclosure dated 21 May 2010

Felicity Steadman, submitted via Inovem

Fredric W Taylor, submitted via Inovem

Friends of Old Headington, email and enclosure dated 21 May 2010

Friends of Warneford Meadow, email and enclosure dated 23 May 2010

Goodman on behalf of Northern Gateway Consortium, email and enclosures dated 21 May 2010

Graham Jones, email and enclosure dated 21 May 2010

Gwen Scott, Chair of Governors Wolvercote Primary School, email dated 21 May 2010

Hallam Land Management and Bloor Homes, email and enclosure dated 21 May 2010

Harriet Fishman, submitted via Inovem

Heather Armitage, email dated 19 May 2010

Headington and St Clements Residents' Associations, email and enclosure dated 21 May 2010

Highways Agency, email, enclosure and letter dated 21 May 2010

J,A. Vimal Rodrigo, letter received 21 May 2010

J Harper, email and enclosure dated 18 May 2010

Magdalen College and Thames Water Property, email and enclosure dated 21 May 2010

Margaret Booth, letter dated 13 May 2010

Mark Pitt, email and enclosure dated 18 May 2010

Nicola Blackwood MP, email and enclosure dated 21 May 2010

Nicholas Lawrence, submitted via Inovem

Oxford Brookes University, email and enclosure dated 19 April 2010

Oxford Green Belt Network, letter dated 10 May 2010

Oxford Preservation Trust, email and enclosure dated 19 May 2010

Oxfordshire County Council, email and enclosure dated 21 May 2010

Oxfordshire Green Party, email and enclosure dated 20 May 2010

Paul Wilson, submitted via Inovem

Raph Moroney, submitted via Inovem

Rosemary Harris, email and enclosure dated 21 May 2010 plus additional email dated 1st June 2010

Sarah Lasenby, submitted via Inovem

Sean Feeney, email and enclosure dated 21 May 2010

Silke Schaeper, email and enclosure dated 20 May 2010

South East England Partnership Board, email and enclosure dated 21 May 2010

South Oxfordshire District Council, email and enclosure dated 24 May 2010

Southfield Golf Club, letter dated 13 May 2010

Sport England, email dated 21 May 21 2010

Tamara Frishberg, email dated 10 April 2010

The Coal Authority, email and enclosure dated 23 April 2010

The Theatres Trust, email dated 18 May 2010

Vale of White Horse District Council, email and enclosure dated 21 May 2010

Wolvercote Commoners Committee, email and enclosure dated 31 May 2010

Appendix 2 – Breakdown of responses by objector

Comments are arranged in columns that correspond to Parts 1 to 4 of the consultation document, as shown on this front page				
	Part 1 Update on housing and employment growth forecasts and the jobs / housing balance	Part 2 Schedule of changes	Part 3 Response to issues raised by the Inspector	Part 4 Addendum to Habitats Regulations Assessment
Respondent	<p>Section A – Housing forecast update (SHLAA UR1b)</p> <p>Section B - Update on workforce growth estimates</p> <p>Section C – Employment land update</p> <p>Section D - Update on employment growth estimates</p> <p>Section E – Revised analysis of jobs/housing balance</p>	<p>Numbered FC1-FC33</p>	<p>Issue A: The implications for the overall provision of housing and employment Development</p> <p>Issue B: The overall housing/employment balance, including the basis and justification of the figures and calculations used</p> <p>Issue C: The implications for the Northern Gateway proposal (and any other relevant sites/proposals), including the scale, nature, mix, extent and phasing of land-uses, particularly housing and employment</p> <p>Issue D: The implications for the regeneration and development of Blackbird Leys and Cowley Centre</p> <p>Issue E: The issue of general conformity of the Oxford Core Strategy with the South East RSS following the legal challenges</p> <p>Issue F: The implications for the 4,000 dwellings originally allocated to the SOSDA, along with the implications for any review to accommodate this housing in Central Oxfordshire or elsewhere, including any possible need to review the Green Belt around Oxford</p> <p>Issue G: The need for any contingency arrangements to deal with the possible reinstatement of the SOSDA at a future date, including any contingencies to cover the phasing, mix and scale of development proposed at the Northern Gateway, and indications of what would trigger a review of the Core Strategy</p> <p>Issue H: The need for any further sustainability appraisal work (including Habitats Regulations/Appropriate Assessment)</p>	<p>Section 3.4 - Recreational pressure</p>

<p>Councillor John Goddard 00165</p>	<p>Section D: 1 rep (00165/001/1D) The statistics on forecast population growth and employment growth used in the FPC are seriously out of date and fail to take into account the impact of the recession and the likely continuing lower level of activity and growth over the plan period.</p>		<p>Issue B: 1 rep (00165/002/3B) The balance between jobs and housing needs to be steadily and gradually improved throughout the period of the plan up to 2026. In face the FPC document makes minimal changes to the jobs/housing mix which remains out of balance, causing overcrowding in the city and congestion and pollution on the roads from in-commuting. It was the lack of adequate weight given to housing need that drove the Panel at the Enquiry in Public to declare the proposed draft RSS unsound and to require more housing, including that at SOSDA. To fail to identify a replacement for SOSDA, either within the City Council's own boundaries or in concert with neighbouring District Councils, in the event of SOSDA's non-re-instatement, revives the reasons for the conclusion of "unsound" on the same grounds of inadequate weight given to housing need.</p> <p>Issue C: 1 rep (00165/003/3C) The City Council has again ignored the traffic implications of the existing situation at the Wolvercote roundabout and the major roads feeding into it and the impact of the additional traffic. Currently, the situation is unacceptable in terms of road safety, noise and air quality; so any increase in traffic is unacceptable.</p> <p>The document appears to pre-empt any consultation on the Area Action</p>	
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			Plan by making assumptions about the area to be devoted to employment and the number of homes to be built.	
J Harper 00197			<p>Issue C: 1 rep (00197/001/3C)</p> <p>Traffic - already there is too much traffic in the area. The proposed scheme will put more traffic onto this stretch of the road.</p> <p>Proposed Housing - the noise for the residents of the proposed building site from the traffic on the A34. I hear it from my house, they will be nearer.</p> <p>School places – there are not enough spaces at the local school. This year 16 children were not offered spaces, but after a lot of discussions room was found for this intake. There is still the Wolvercote Paper Mill site to be thought of.</p>	
Oxford Preservation Trust CR70			<p>Issue C: 1 rep (CR70/001/3C)</p> <p>Note from the proposed amendment to Policy CS6 that in light of the uncertainties surrounding the South Oxford SDA, the Class B related activities at the Northern Gateway are to be limited to 55,000 square metres, rather than being in a range of 55,000 – 80,000 square metres, as was proposed in the submission draft. If there are to be further hearing sessions, the Trust would want to explore the land use implications of this <i>de facto</i> reduction in the overall amount of B Class development.</p>	<p>1 rep (CR70/002/4)</p> <p>Note that, as part of the Northern Gateway strategic allocation, the Council is still contemplating the possibility of development in the Green Belt south of the A40. The Trust made its position clear on this issue in its written statement on the Green Belt & the Northern Gateway (Ref. CR70) and in the contributions it made at the hearing sessions on those matters: there is no RSS support for a small-scale review of the Green Belt at Peartree; it is ‘unnecessary’ and will lead to uncertainty in so far as other areas of Green Belt around Oxford are concerned.</p>

				DELETE the references in paragraph 4.3 to the siting of development 'on the Green Belt land south of the A40' and any other references to a 'small-scale review' of the Green Belt around Oxford.
Margaret Booth CR1411		<p>FC5: 1 rep (CR1411/001/FC5)</p> <p>There seems to be confusion in this material about the implication of an improvement in the ratio of jobs in the city to the economically active population. It is true that under both the high and low job growth scenarios there is a small fall in this ratio. However, this fall does not necessarily mean that there is a reduction in the numbers of people commuting, because the absolute numbers of both jobs and economically active residents are projected to rise substantially. Under the high job growth scenario in the Plan there would be an increase of around 2,250 in the absolute excess of jobs over the number of economically active residents and therefore an increase of this size in the number of people having to commute. Even under the low job growth scenario the number of commuters is projected to fall only by 369. If one assumes actual job growth in jobs somewhere between the two scenarios, then an increase in the number of commuting would be inevitable.</p> <p>Some of the problems of large scale commuting are set out in</p>		

		<p>FC5. However, it does not mention the serious environmental impact of commuting. The aim should be to decrease the number of people commuting into the city. This would be achieved by dropping Northern Gateway proposals from the plan.</p>		
<p>Oxford Brookes University CR291</p>			<p>Issue F: 1 rep (CR291/001/3F) Support the statement in paragraphs 3.20 that the Inspector should conclude the examination on the basis of the allocation of 8,000 dwellings for Oxford, with no reference to the 4,000 homes, which had previously been allocated to SOSDA.</p> <p>Issue G: 1 rep (CR291/002/3G) The statement in paragraph 3.23 that the Council would bring forward a partial review of the Core Strategy should the Government's refresh of the Regional Spatial Strategy result in an increase to Oxford's housing allocation is also strongly supported. If the housing allocation is increased this could potentially limit the number of sites available for the provision of student accommodation. This would be a matter of great concern to the University as no sites for student accommodation are currently identified in the Core Strategy; a number of sites allocated in the Oxford Local Plan 2011 – 2016 are no longer available. It is imperative therefore that if there is any increase in the housing allocation for</p>	

			Oxford that evidence is assembled demonstrating that this can be accommodated without necessitating the use of sites that would be suitable for purpose built student accommodation for Oxford Brookes University.	
Oxford Green Belt Network CR122		<p>Various FC's: 1 rep (CR122/001/FC) Support deletion of all references to the South Oxford SDA and to a selective review of the Green Belt to facilitate this.</p> <p>FC.5: 1 rep (CR122/002/F5) Opposed to the Northern Gateway proposal, notwithstanding the reduction in space devoted to employment uses to 55,000 sq metres. Question the wisdom of creating more jobs here and risk worsening, the existing housing/employment balance.</p>	<p>Issue C: 1 rep (CR122/003/3C) Housing development at Northern Gateway would be inappropriate because of pressures on school places at Wolvercote, traffic and access problems, and possible implications for the Oxford Meadows SAC. The Safeguarded Land should remain as open space, containing and shaping the outward growth of the city and providing visual relief from the existing garages and motor lodge facilities.</p>	<p>1 rep (CR122/004/4) Para 4.3 implies housing development on the Green Belt land to the South of the A.40. Yet this portion of the Green Belt is land which the Inspector who conducted the Inquiry into the Local Plan 1991-2001 made a point of stating should remain Green Belt to protect the landscape setting of Oxford. The situation has not changed and we believe that this area of Green Belt should remain open and retain its green belt status.</p>
Oxfordshire Green Party CR1589	<p>Section A: 1 rep (CR1589/001/1A) Question whether the updated SHLAA assessment is the right figure for arriving at the supply of housing land and consider the South East RSS target of 8,000 dwellings more realistic than the 9, 132 the Core Strategy proposes</p> <p>Section B: 1 rep (CR1589/002/1B) Using the same base methodology but a housing growth forecast of 8,000 dwellings, 10, 205 additional economically active persons would result rather than 11,111.</p> <p>Section C: 1 rep (CR1589/003/1C)</p>		<p>Issue A: 1 rep (CR1589/006/3A) Every attempt should be made to limit employment growth in Oxford to the level, compatible with full employment, whilst accepting Oxford will continue to have central place functions. We continue to accept the need to increase housing but to also limit levels compatible with Oxford's other needs, not least the requirement that the outstanding character of the built environment and green spaces of Oxford are maintained.</p>	

	<p>The estimates of employment based on existing available land and its take-up are highly questionable and this update in no way provides a reliable or realistic forecast. This is based on our view that the Core Strategy was drawn up at the end of a period of unsustainable economic growth that resulted in a global economic crash. Query the estimates given for employment take-up from the various sources shown, and consider the forecasts to be too high.</p> <p>Section D: 1 rep (CR1589/004/1D) Do not think the analysis contains forward thinking on the growth of employment from home working and the reduction in requirements for extra floorspace. We consider that over the period to 2026 there is likely to be a different dynamic, less dependent on the allocation of additional floorspace but hopefully ensuring in the long run full employment for Oxford residents. In the next decade we would consider a far lower forecast of employment, given all the current difficulties in the national economy, and since a large proportion of Oxford's employment is in the public sector.</p> <p>Section E: 1 rep (CR1589/005/1E) Since this is based on the employment estimates that we have strong reservations about, we are very sceptical about this analysis. Although the 2026 ratio shows a reduction from 2006, in absolute numbers there is an actual increase in the high job growth estimate from an imbalance of 22,000 to 24,251 in 2026. The low growth estimate shows a mere reduction of 369 from 2006. It is this imbalance that leads to Oxford's problems of inward commuting,</p>		<p>Issue B: 1 rep (CR1589/007/3B) Do not think that Oxford's role as a regional hub means that the existing high level of commuting is justified. Oxford is a heritage city with its unique setting. This does not rule out some acceptance as a central place in Oxfordshire. However, the necessity to limit the ill effects of too much inward commuting needs also to be balanced. Home working may assist this as will limiting employment change to central functions which really enhance Oxford and its wider community.</p> <p>Issue C: 1 rep (CR1589/008/3C) Do not consider altering the phasing and reducing the size of the development meet objections to the Northern Gateway. The area should be retained as an important break between northern Oxford and Kidlington. There are severe problems in relation to traffic and pollution, which make the environment for housing unsatisfactory in many respects. Development will put additional pressure on schools in North Oxford. The land has value for food production and is important in water catchment terms to the Oxford Meadows SAC.</p> <p>Issue D: 1 rep (CR1589/009/3D) The removal of SOSDA has large implications on the regeneration of Blackbird Leys and Cowley Centre.</p> <p>The regeneration of Blackbird Leys</p>	
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	<p>traffic congestion, pollution and carbon emissions.</p> <p>In our view this problem can only be resolved by limiting the growth of employment. We do not think it is beyond the realms of plausibility to consider the possibility and feasibility of a reduction to 15,000 in the imbalance between jobs and economically active residents. In this scenario, there would be no call for development and more jobs at the Northern Gateway.</p>		<p>can be achieved by allocating land that has no chance of being developed. The removal of possible section 106 contributions coming from the SOSDA development that might assist this, together with the impact of loss of expenditure from an increased local population, will have major economic implications.</p> <p>With a slowing of consumer growth and the removal of the main additional source of consumer spending in the area if SOSDA does not go ahead, we consider the extent of land allocated for development in the Cowley primary district centre designation as unrealistic. Also the development of improved transport links will not go ahead presumably to the same extent. The same argument applies to the designation of Blackbird Leys as a district centre.</p> <p>Do not think the optimistic submissions of the landowners, given the above considerations, for an enhanced Cowley centre are sustainable.</p> <p>Issue E: 1 rep (CR1589/010/3E) There are other options that could be held to be in conformity with South East RSS. A housing target of 8,000 dwellings as suggested by us is in conformity with the South East RSS.</p> <p>The employment allocation in the South East RSS was for the Oxford</p>	
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			<p>sub-region and does not require to be actually located within the boundaries of Oxford. The regional guidance at that stage on planning employment was correct to be generally left at this level.</p> <p>Note the emergence of the South East Partnership Board's employment guidance giving a breakdown for employment increase in Oxford. These job numbers are not robust enough as targets within policy and are for monitoring purposes only. The employment increase figures can only realistically apply to a sub regional level and the Core Strategy must be given some flexibility in determining employment levels and sites within the much narrower city district itself.</p> <p>We would be pleased to see SOSDA removed as a proposal with no prospect of it being re-instated.</p> <p>Issue G: 1 rep (CR1589/011/3G) We would resist the re-instatement of SOSDA, which is part of an unsustainable upward growth dynamic that would put too much pressure on Oxford's character as a unique city.</p> <p>We are particularly concerned about the City Council's mention of a yet another partial review of the Core strategy, which also seems to be quite possibly incorporating implications for the phasing, mix and scale of development at the</p>	
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			<p>Northern Gateway, as well as a possible review of the Green Belt and reconsideration of SOSDA yet again. We dislike the way the planning process and in particular the process of this strategy has incorporated dribs and drabs of further information and further changes.</p>	
<p>Southfield Golf Club CR1530</p>		<p>FC1-FC-9, FC12-FC-16, FC23-FC26 & FC29: 1 rep (CR1530/001/FC) Support pragmatic approach set out in the Further Proposed Changes to remove the references to the South Oxford Strategic Development Area (SOSDA) from the plan.</p>	<p>Issue A: 1 rep (CR1530/002/3A) Endorse the view that deletion of SOSDA from the RSS does not affect the Core Strategy's ability to deliver the 8,000 dwellings required at Oxford, nor does it prevent the target being exceeded. Performance will be closely monitored anyhow and adjustments can be made to the housing trajectory, through a review of the Plan.</p> <p>Issue F: 1 rep (CR1530/003/3F) Support the view that any review of the Oxford Green Belt could be incorporated in a partial review of the Core Strategy, as could a subsequent re-instatement of the SOSDA. Therefore, there is no need to include further contingency over and above the provisions set out in the Further Proposed Changes.</p> <p>As the city's population and workforce increases, it will be even more important that the city retains its recreation and amenity green infrastructure. The city's green assets within the built-up area must be robustly protected by the Core</p>	

			Strategy, as an integral part of a balanced and sustainable spatial strategy.	
Tamara Frishberg CR1413			<p>Issue C: 1 rep (CR1413/001/3C)</p> <p>Dismayed to see that the Northern Gateway development, though somewhat reduced, remains part of the Core Strategy. Even if the jobs/housing gap is closing, we do not need a whole new business area drawing more people in to work in Oxford. Concerned about traffic implications, not enough school places and degradation of air quality in an area already challenged by traffic fumes and noise. The Northern Gateway development plan needs to be dropped without wasting any more tax payers' money in researching the possibilities</p>	
Hallam Land Management and Bloor Homes 00064		<p>FC8: 1 rep (00064/001/FC8)</p> <p>The progression of the Core Strategy and the deletion of the references to the SOSDA are premature pending the finalisation of the RSS process. The deletion of the policy in relation to SOSDA prejudices the outcome of that process and precludes early implementation of the RSS.</p> <p>We consider the appropriate course of action is not to make changes pending the outcome of the RSS and to defer finalisation of the Core Strategy until that time.</p> <p>In the alternative there is no</p>		

		<p>reason not to take account of one potential outcome of the RSS process – that SOSDA be confirmed or reinstated.</p> <p>Suggest that Policy CS8 and related text can be retained in the Core Strategy, albeit with minor modifications. Propose detailed changes to reflect current position.</p>		
<p>Goodman (on behalf of the Northern Gateway Consortium) 00018</p>	<p>Section A: 1 rep (00018/001/1A) The Northern Gateway site is capable of delivering at least 500 dwellings over the Core Strategy period, which is consistent with the Consortium’s representations at the Examination in September 2009. This would provide more certainty on housing delivery, reduce the dependence on windfall sites to meet the 1,648 dwelling shortfall and respond to the Council’s corporate priority for housing delivery.</p> <p>Section C: 1 rep (00018/002/1C) Although the amount of developable land at Oxford Business Park is correct, the outline planning permission allows only for a further 35,245 sq metres for B1 office use, not 41,630 sq metres as stated. The Consortium agrees that the Business Park will be fully developed by 2016.</p> <p>The Council has adopted a worst case scenario when forecasting that development at the Science Park will be completed by 2019/20, by using average take-up rates of 2,700 sq metres. Using a higher long-term average take-up rate of 4,600 sq metres would result in development of the remaining 28,632 sq metres being complete by 2016.</p>	<p>FC6: 1 rep (00018/004/FC6) Amend sixth bullet point as follows:</p> <ul style="list-style-type: none"> • Provide complementary residential development (a minimum of 500 units) <p>FC7: 1 rep (00018/005/FC7) Amend the complementary uses to include the following:</p> <ul style="list-style-type: none"> • Residential dwellings (a minimum of 500 dwellings) <p>FC28: 1 rep (00018/006/FC28) Amend the total number of new homes as follows:</p> <ul style="list-style-type: none"> ▪ Provision of 200 new dwellings (by 2016) • Provision of a minimum of 500 new dwellings (by 2026) <p>This increase would not only improve the housing/jobs balance in Oxford overall, but would also improve the sustainability of the development by placing housing next to jobs in a location that is well served by public transport.</p>	<p>Issue C: 1 rep (00018/007/3C) Welcome the inclusion of the reference to providing complementary residential development. This will enhance the sense of place and add vitality and sustainability to the Northern Gateway proposals. However, suggest that the Core Strategy would become more effective and consistent with national policy if the quantum of residential development set out in Policy CS6 is increased to 500 dwellings. This can be achieved without impacting on the revised upper limit of Class B-related activities (up to 55,000 sq metres).</p>	

	<p>The findings in the Annual Monitoring Report demonstrate that employment land is being redeveloped for residential uses and could indicate why, in recent years, Oxford has benefited from a high level of housing from windfall sites. Furthermore, the Further Proposed Changes document proposes the protection and modernisation of a number of key employment sites. The likelihood of sustaining forecast windfall rates needs to be assessed against this protection policy.</p> <p>Section D: 1 rep (00018/003/1D) Consider some of the growth assumptions to be questionable, e.g. whether 2,200 additional jobs could be delivered by 2016 through the modernisation/redevelopment of existing protected employment sites. The forecast employment growth in the West End is assumed to be delivered by 2016. The Consortium argues that job delivery in the West End is more likely to be spread over a longer time period, of up to 2021.</p>	<p>As such, the development will accord with Government advice in PPS1, PPS3 and PPS4.</p>		
<p>Vale of White Horse District Council CR7</p>	<p>Section B: 1 rep (CR7/001/1B) Table 1 only applies predicted household size in 2026 to new dwellings, but this should be applied to the whole population not just the new housing. This places the calculations in some doubt as the existing population will spread into the new housing as the average household size falls.</p> <p>There is no justification for the assumption that the economic activity rate will remain fixed for 20 years. It is likely the rate will fall as the population of the UK is expected to become more aged. Further the average household size of 2.38 predicted by Fordham Research is well above that</p>	<p>FC5: 1 rep (CR7/003/FC5) It is considered that the information regarding the jobs to workers ratio set out in the further proposed changes is flawed and a revised analysis is likely to show a worsening of the ratio.</p> <p>FC7: 1 rep (CR7/004/FC7) Given that the improvement in the ratio is an aim of the core strategy and is a need in the South East Plan the proposed job growth should be re-examined with potential for</p>	<p>Issue B: 1 rep (CR7/005/3B) The document sets out an analysis of the expected levels of job growth in Oxford to 2026 in comparison to the expected growth in economically active persons. This concludes that there will be an improvement in the balance between jobs and economically active in accord with the aims of the core strategy. The inclusion of specific information on this topic in the core strategy is also noted and welcomed.</p> <p>Issue C: 1 rep (CR7/006/3C) The changes proposed include the</p>	

	<p>expected by Oxfordshire County Council of 2.26. Applying the County's predicted average household size leads to a predicted population growth of 20,638 some 1,096 or 5% lower</p> <p>In combination, these factors make the predicted growth in economically active persons likely to be an exaggeration of the likely level of growth in the workforce. Even if there is a reduction of 10% the jobs to worker ratio will worsen rather than improve in the high growth scenario.</p> <p>Section E: 1 rep (CR7/002/1E) If the jobs to worker ratio does not improve or indeed worsen there will be consequences for the Vale. Further, the expected growth of up to 10,280 jobs in Table 4 will take up 57% of the indicative job growth of 18,000 for 2006 to 2016 as set out in the South East Plan, leaving only 43% to be spread across the other districts.</p> <p>For these reasons it is considered that the information regarding the jobs to workers ratio set out in the further proposed changes is flawed and a revised analysis is likely to show a worsening of the ratio. Given that the improvement in the ratio is an aim of the core strategy and is a need in the South East Plan the proposed job growth should be re-examined with potential for further reductions in the job growth ceiling at the Northern Gateway</p>	<p>further reductions in the job growth ceiling at the Northern Gateway</p>	<p>introduction of an overall ceiling on floorspace at the Northern Gateway which will lead to an expected job growth of 3,000. This lowering of the ceiling is noted and welcomed.</p>	
<p>Campaign to Protect Rural England, Oxfordshire Branch</p>	<p>Section B: 1 rep (CR192/001/1B) Query the method used in Table 1 to estimate future workforce. There is a fundamental flaw in this method of estimating the NET changes in population</p>	<p>FC1: 1 rep (CR192/004/FC1) Would contend that the Northern Gateway strategic allocation should be deleted as a Strategic Site at this stage as the</p>	<p>Issue A: 1 rep (CR192/009/3A) <u>Northern Gateway</u> - do not see any reasoned justification for the scale now proposed. Contend that it is not 'well integrated physically and</p>	<p>1 rep (CR192/017/4) We understand that this has been revised in light of further discussions with Natural England and BBOWT about the HRA requirements.</p>

<p>CR192</p>	<p>and economically active.</p> <p>We would argue that one must also apply the reduced Average Household Size (AHS) at 2026 (2.38) to the existing housing stock at baseline 2006 (we estimate 56,692 on the City figures i.e. population of 149,100 at 2.63 AHS) as well as the additional houses 9,132 (without SOSDA). The city only apply this to the additional 9,132 houses (para 1.13).</p> <p>By 2026 there will be 56,692 households baseline+ 9,132 additional houses = 65,824 households total. Hence at AHS of 2.38 this means population of 156, 660 – or NET additional population growth of 7,560 – not 21,734. Using City figures, in turn this means NET additional economically active of 4,052 – not 11, 649.</p> <p>Section C: 1 rep (CR192/002/1C) There appears to be no reasoned justification for the revised floorspace figures for Northern Gateway.</p> <p>Section E: 1 rep (CR192/003/1E) Would argue that the ratio of jobs/housing is actually worsening – not improving.</p> <p>On the basis of the reworked figure of net additional economically active in Section B, there now appears to no rationale for the Northern Gateway strategic allocation in the foreseeable future and the CS changes certainly do not make the case for it.</p>	<p>CS changes have not made the case for it.</p> <p>FC5: 1 rep (CR192/005/FC5) The overall numbers and method is flawed. On our reworked figures the trend is up, not reducing imbalance.</p> <p>FC6/FC7: 2 reps (CR192/006/FC6, CR192/007/FC7) Do not see any reasoned justification for the proposed revised scale of Northern Gateway strategic allocation now proposed in the CS changes. For housing we still contend this location would be unsuitable and remote - especially for lower income households and particularly if the intention is to develop the housing element on some or all of the Green Belt in this area.</p> <p>FC20: 1 rep (CR192/008/FC20) Would argue that it is unnecessary to have any reference in the CS to a hypothetical future urban extension – which we assume would have to be outside the City’s boundaries and therefore hardly in the gift of the city as planning authority.</p>	<p>functionally’. We would argue for Oxford to contain itself within its boundaries and maintain some spare land for future flexibility.</p> <p><u>West End</u> – it appears that the underlying policy for the West End has changed and is now for less housing – not more. We would not support this. More retail will only tend to exacerbate the jobs/ housing imbalance and cause more traffic through the heart of the medieval City and all its constraints.</p> <p>Issue B: 1 rep (CR192/010/3B) Despite the overall balance between employment and housing being a cornerstone of the SE Plan policies for Oxford City, this now seems to be saying overtly that they think it is not that important and is not a reasonable policy to have to follow. Imbalance is “inevitable” they now say. Saying that the imbalance is ‘inevitable’ suggests that the City is providing the rationale for a future urban extension. Oxford cannot be compared to Reading. It is a historic and therefore unique city, set in a special setting.</p> <p>Issue C: 1 rep (CR192/011/3C) What is the reasoned justification for picking 55,000 sq metres? Can a cap really be put on development in practice if site has capacity for 80,000 sq metres? Has the site area been scaled down pro rata? Does it exclude the two areas of Green Belt, and if not why not if scaled down?</p>	<p>It is very difficult to comment meaningfully with no revised masterplan for the revised Northern Gateway proposals especially in terms of where housing may be located.</p>
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			<p>at some point unknown in future then the City may have to carry out a partial review of the Core Strategy.</p> <p>Issue G: 1 rep (CR192/015/3G) We have always argued that there is no need for any contingency at this stage, especially speculating about possible changes to Northern Gateway plans if SOSDA or another urban extension were revisited at some point unknown in future.</p> <p>There may be new needs between now and 2026. It is unwise in the extreme to use up the only contingency area the City has for a case that is simply not proven at this stage.</p> <p>Issue H: 1 rep (CR192/016/3H) We have various concerns about the impacts of the current Northern Gateway plans. A revised masterplan should have been produced to enable some meaningful judgments to be made - even if tentative layout.</p>	
Councillor Jean Fooks CR1790		<p>FC5: 1 rep (CR1790/001/FC5) The paper says that the jobs:housing ratio has improved over the last few years, but does not give the figures for the number of Oxford residents actually working in the city. To improve the ratio in any meaningful way would require the ratio to take account of the increasing number of residents who commute outwards, mostly</p>	<p>Issue C: 1 rep (CR1790/003/3C) Although the estimate of the number of jobs is just over 3000 for the Class-B space, I see no estimate for those associated with the other uses listed. The total number of jobs, and hence people needing to access the site, is very much more than 3,000 on the figures now being proposed.</p> <p>As the Class B uses are intended to</p>	<p>1 rep (CR1790/004/4) Paragraph 4.6 states that the safeguarded land at Summertown falls within the urban village of Cutteslowe. This is palpable nonsense: Cutteslowe could be said to have a southern boundary along Victoria Road at the furthest, more likely the boundary should lie just south of Aldrich Road, the 'urban village' extends north of the ring road to the northern boundary of the city. Although Cutteslowe park provides</p>

		<p>to London as there are very good transport links by road and rail. What is needed to reduce the in-commuting is to reduce the number of jobs in the city and use available land for housing. But this housing has to provide a high quality living environment, with community facilities included, and not be added on at the edge as is proposed for the land north-west of Goose Green.</p> <p>FC10: 1 rep (CR1790/002/FC10) Proposes to have 541 new dwellings in Summertown by 2026, as well as 3110 new jobs. The safeguarded land in Summertown is unsuitable for development and is still in use as school and college playing fields and allotments. There is very little land available for creating new employment space. The old Oxfam offices in Summertown could be remodelled to provide some office space, there is scope for a little new building but the figures proposed would result in gross overdevelopment of the district centre.</p>	<p>be related to Oxford's key sectors of science and technology research etc, employees are likely to come from a wide area, not from the areas of Oxford most in need of employment, which lie mostly in the south east. Travel is bound to be largely by car. It is also questionable whether this site, isolated as it is from the city, is a convenient location for such employment</p> <p>The housing is proposed for an area of Green Belt land, difficult to access and not at all able to be integrated into the urban fabric of the city. There are already insufficient school places at Wolvercote Primary school and no space to expand on the present site; so additional children would put unacceptable pressure on the local schools to such an extent that children would not be able to attend a school near where they live, a key feature of a sustainable community.</p>	<p>open space for that 'urban village', it most certainly does not provide it for the centre of Summertown where the safeguarded land lies. Earlier studies of Summertown as an area have identified that in fact Summertown is currently short of open public green space, so it would be quite inconsistent with the Accessible Natural Greenspace Standard to build more dwellings on that land. The development of windfall sites is currently adding to the population without adding to the green space available to them.</p>
Nicola Blackwood, MP 00168	<p>Section A: 1 rep (00168/001/1A) Projected housing need during the period of the plan is 8,000 extra houses between 2006 and 2026. This target is dictated by the RSS and has not been altered to account for the deletion off SOSDA, nor is it justified separately despite the abolition of regional planning targets.</p>	<p>FC1: 1 rep (00168/003/FC1) Doesn't show any of the priority accessibility improvements taking place in North Oxford on the access roads to Northern Gateway. It is clear that the Northern Gateway is quite unfeasible until at least the road</p>	<p>Issue B: 1 rep (00168/004/3B) Inspector identified the ratio of jobs to housing as a key issue in his letter. The document suggests that the ratio is expected to narrow but nowhere confronts the fact that the Northern Gateway, despite the reduction in employment land, will</p>	<p>1 rep (00168/007/4) Section 4.3 has a number of major factual errors about access points to Port Meadow, the closest of which is only a few hundred yards from the proposed housing not as stated at the Trout Pub. Furthermore, no mention is made of impact that the hundreds of new houses</p>

	<p>Section C: 1 rep (00168/002/1C) The document still does not demonstrate the need for substantial increases in employment land in Oxford, but does show that the impact of the recession means that Oxford Science Park is not expected to be filled until 2019. Many other sites such as Begbroke, Kidlington and Milton Park provide the potential for employment uses close to the City but without increasing current traffic problems caused by in-commuting.</p>	<p>changes delivered by Access to Oxford have been shown to significantly reduce traffic flows. These road improvements must be made a pre-condition for any development.</p>	<p>inevitably perpetuate the jobs/housing imbalance by creating more jobs than housing. Oxfordshire County Council have already highlighted that the proposals appear to contravene PPG13 in that encourages in-commuting. In this document, the deletion of SOSDA but retention of the Northern Gateway only serves to exacerbate that contravention.</p> <p>Issue C: 1 rep (00168/005/3C) Pleased to see reduction in employment development from 80,000 to 55,000 sq metres and a target of 200 houses. Also pleased to see the City Council have listened to requests for details of phasing. However, I am still unconvinced that, when combined with the proposed development in Summertown, that local infrastructure can in fact cope with the increase. Would like to see an impact assessment on local schools and transport..</p> <p>The area has great housing need, especially affordable housing, but we should wherever possible avoid building on Green Belt land. The 200 dwellings will be on Green Belt land in apparent contravention of the new Government's policy.</p> <p>Concerned that new housing development will put added pressures on school places at Wolvercote School. This is a vital issue to local people.</p>	<p>at the Mill site in Wolvercote may have on the Meadow and on traffic levels in the village.</p>
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			<p>Concerned that the 27,000 sq/ft of retail space planned for the site will impact on local shops in Summertown and Wolvercote.</p> <p>Issue E: 1 rep (00168/006/3E)</p> <p>The document does not seem to have taken into account the abolition of regional planning targets under the new government, with discussion of the South East Plan remaining prominent.</p>	
<p>Rosemary Harris 00089</p>	<p>Section D: 1 rep (00089/001/1D)</p> <p>It was recently reported that the Destination Management Organisation is planning to invest £1m on promoting tourism and has a target of creating 4,000 additional jobs in Oxfordshire. Since the City Council is providing the largest share of funding, it follows that the City would probably expect the largest proportion of these jobs to be within the City.</p> <p>The Oxford Hotel, within the boundary of the Northern Gateway, has confirmed its intention to build 70 new guest bedrooms this year and is also seeking to build a new conference room. The City Council appear to have been aware of this prior to the consultation but do not appear to have included any additional growth in jobs in their forecast as a result. This may also mean that there is no requirement for an additional hotel at the Northern Gateway.</p> <p>Both of the above would have an impact on the jobs/housing imbalance.</p>		<p>Issue A: 1 rep (00089/002/3A)</p> <p>Inspector has been asked to conclude the examination on the basis of the allocation of 8,000 dwellings for Oxford with no reference to the 4,000 homes which had previously been allocated to SOSDA. However, no tables in the FPC are based on a target of 8,000 dwellings. Separate tables should be provided to understand how the target of 8,000 homes affects the jobs/housing balance, if this is what the strategy is based upon. Also it would be helpful for tables to include figures which reflect the economic climate so that realistic and informed debate could take place at any additional hearings and the CS can then be assessed to see if it is sufficiently flexible enough to last its planned term.</p> <p>Issue B: 1 rep (00089/003/3B)</p> <p>If 4,000 homes at SOSDA are deleted from the Core Strategy, it would indicate that there would be 5,000 less economically active people using</p>	

			<p>the methodology which the City Council apply. Therefore, there needs to be a corresponding reduction of 5,000 planned jobs.</p> <p>Dropping the NG would cut 4,000 jobs – so there needs to be consideration as to which other policies need to be scaled down. Spatial planning and assessment needs to be undertaken of where the predicted workers at the Westgate Centre will live now if SOSDA is deleted due to its proximity to this strategic site.</p> <p>Assuming the evidence base for the Core Strategy requires a target of at least 12,000 homes to balance the predicted jobs created, if there is no corresponding reduction in jobs now planned, then the original evidence base upon which the policies in the CS were drawn up upon, cannot be seen as credible or robust.</p>	
Graham Jones 00199	<p>Section A: 1 rep (00199/001/1A) The figures provided are probably as good as you can get when looking ahead sixteen years.</p> <p>I am concerned that some of the provision is expected to come from green belt land off the A40, close to several SSSIs, fairly isolated from the rest of Wolvercote and with access adding to the already busy A40 close to Wolvercote Roundabout. This is unacceptable. Other possibilities, closer to the Pear Tree Flyover and Roundabout and the high noise levels, will make the housing more isolated from established communities and access will add to the</p>		<p>Issue C: 1 rep (00199/004/3C) Request Northern Gateway proposals are removed from the Oxford Core Strategy 2026.</p> <p>The suggestion that a range of retailers could be established at Northern Gateway ignores the damage this could do to local shops at Wolvercote and Kendall Crescent, but also to shops in Summertown and the City centre.</p> <p>Cannot understand the continuing mention of the emergency services relocating at the Northern Gateway.</p>	

	<p>existing traffic problems there.</p> <p>Section C: 1 rep (00199/002/1C) Based on how long it is taking to fill the Business Park, it could well take at least 20 years to fill existing land and premises in the city, including Oxford Science Park and the West End. There is no mention of Oxford University's development of the old Radcliffe Infirmary site, expected to take another 18 years to complete. It seems evident that there will be insufficient demand for further employment land in Oxford until beyond 2030. This should rule out the need for the development of the Northern Gateway on one of the most congested roads into Oxford.</p> <p>Section E: 1 rep (00199/003/1E) It is clear from the figures obtained to provide forecasts until 2026 that these are very finely balanced and are vulnerable to many factors, whether it be a longer period of recession, technological advances reducing space requirements or initiatives taken by surrounding district councils to improve their own jobs/housing ratio.</p> <p>Oxford provides jobs well in excess of the needs of its own population and it can be expected that new employment land will attract a similar balance of Oxford/non Oxford residents to the newly available jobs, further increasing the traffic congestion.</p>		<p>Any solutions to the traffic problems at Northern Gateway will not be cheap and with current pressures on public spending it is likely to take at least 10 years to implement. Such a solution, however, is unlikely to cope with extra traffic movements brought about by the Northern Gateway development.</p>	
<p>South Oxfordshire District Council CR5</p>	<p>Section B: 1 rep (CR5/001/1B) This council remains particularly concerned about the housing/employment imbalance and at how the economically active in 2026 have been calculated in Table 1. Using the</p>	<p>FC5: 1 rep (CR5/003/FC5) The Council considers that the information regarding the jobs to workers ratio set out in the further proposed changes is</p>		

	<p>2006 occupancy rate of 2.63 for 2026 calculations on the existing housing stock instead of the 2026 forecast occupancy rate of 2.38 results in an overestimate of 7,979 economically active. If the 2.38 occupancy rate is used for all houses in the 2026 calculation, the total economically active will be 83,750 (considerably less than the City Council’s forecast of 91,549).</p> <p>Section E: 1 rep (CR5/002/1E) If more jobs are provided in Oxford than the forecast increase in economically active residents these jobs will have to be filled by people from outside the city. This means that more people will commute into the city, this will increase congestion around the city and on approach roads in South Oxfordshire.</p> <p>This council considers that the information regarding the jobs to workers ratio set out in the further proposed changes is flawed and that a revised analysis is likely to show a worsening of the ratio. Given that the improvement in the ratio is an aim of the core strategy and is a need in the South East Plan the proposed job growth should be re-examined with potential for further reductions in the job growth ceiling at the Northern Gateway</p>	<p>flawed and a revised analysis is likely to show a worsening of the ratio.</p> <p>FC7: 1 rep (CR5/004/FC7) Given that the improvement in the ratio is an aim of the core strategy and is a need in the South East Plan the proposed job growth should be re-examined with potential for further reductions in the job growth ceiling at the Northern Gateway</p>		
Engage Oxford 00001	<p>Section A: 1 rep (00001/001/1A) The revised forecast for housing makes it clear there is no case to build on Green Belt land in the period to 2026.</p> <p>Section B: 1 rep (00001/002/1B) Population estimates show significant anomalies.</p>		<p>Issue A: 1 rep (00001/006/3A) The SHLAA forecasts over 9,000 houses could be built against an original target of 8,000 in the RSS. The 200 houses proposed for the Northern Gateway are to be placed on Green Belt land and are tiny in number compared to the target. PPG2 states that “Inappropriate</p>	<p>1 rep (00001/009/4) The factual inaccuracy of the submission on the Habitat Regulations Assessment is an indicator of the hasty and poor quality preparation in this document</p> <p>4.3 and 4.4. Access to Port Meadow from the North is not “near the Trout pub” with “The nearest other</p>

<p>Ratios used to calculate household size should be treated with caution as the baseline of 2.32 is the same as at the 2001 census and does not reflect the large amount of small units of accommodation built since then.</p> <p>Oxford City Council states that there is a waiting list of 5,000 people on the housing register. The calculation for population and occupancy ratios assumes that this number does not decrease significantly.</p> <p>Table 1 The figure of 9,132 homes is the latest estimate, as requested by the Inspector. However, in quoting a figure above the planning target there is a danger that the argument for more commercial building land becomes circular.</p> <p>Section C: 1 rep (00001/003/1C) Oxford Business Park figures fail to mention or account for a number of units on the site which have been sold but which remain unoccupied. The Park will be fully developed long before it is fully occupied. It is not stated over what period Goodman's average is calculated. It is likely that the take-up rate in the next few years will be affected by the economic climate, so this forward projection appears overly simplistic.</p> <p>The City Council has estimated jobs growth <i>on only some</i> of the key <i>protected</i> sites.</p> <p>It is not clear that the use of 'contract' instead of permanent research staff at the University of Oxford should lead to fewer long-term space requirements. This will</p>		<p>development is, by definition, harmful to the Green Belt." It will be hard to show any exceptional circumstances to justify a breach of Green Belt using these figures.</p> <p>There is an implication that new "additional employment development" is needed to meet the housing /employment balance. This is challenged in our comments elsewhere.</p> <p>Issue B: 1 rep (00001/007/3B) The uncertainty caused by using different bases for the various numbers is greater than the size of the trends being measured. The conclusions are statistically invalid.</p> <p>Issue C: 1 rep (00001/008/3C) It is not clear how the Council can enforce a "maximum ceiling" for development once the development phases have started. Equally there is no constraint on the number of employees that could work on the site. The incorrect calculation of the ratio of employees to floor space was discussed at previous hearings but has simply been repeated and not corrected.</p> <p>The Council has stated elsewhere that the only acceptable site for residential development at the NG is on the Green Belt land. The safeguarded land has been rejected as too noisy and too polluted. Development of Green Belt land need not be consolidated into the</p>	<p>access ...over 3km away". Pedestrian access is available via the Jubilee Gate at the bottom of the canal bridge, and there is a car park at the Bathing Place off Godstow Road. Both are much closer to the proposed housing, therefore increasing the potential impact on the SSSI.</p> <p>This section of the Assessment needs to be rewritten to reflect these facts but surely the authors of this document must visit and become familiar with the areas they plan for?</p>
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<p>depend on the nature of the research, not the employment status of the researcher.</p> <p>There is no reference as to what was taken into consideration to support reducing the scale of the Northern Gateway. Proposing changing policies in the Core Strategy by scaling down the size of the Northern Gateway, taking into account the possible deletion of SOSDA, means that with or without SOSDA, the original evidence base was not robust. We believe that that scaling down was just to reduce the job numbers to help improve the housing/jobs balance.</p> <p>Now that the housing target has just been increased upwards to 9,123 new dwellings, there can be no exceptional circumstances to justify a Green Belt review at the Northern Gateway.</p> <p>Believe that the Emergency Services are no longer moving to this site so reference to 10,000 sq ft needed for them must be deleted. The evidence base for 27,000 sq ft of small retail units is questionable.</p> <p>Section D: 1 rep (00001/005/1D) Table 2 does not show the potential for the numbers of jobs which have been created as a result of development which was built between 2006-2010. Also 'modernisation of key protected employment sites' fails to include several sites which are in the evidence base at CD7/22. There is no explanation as to why job forecasts have been reduced compared to CD7/22.</p> <p>Section E: 1 rep (00001/005/1E) Table 3: some of the housing sites in the</p>		<p>proposal to allocate the safeguarded land, and no justification is offered for this assumption.</p> <p>No requirement has been demonstrated for more commercial (Class B) floorspace in Oxford before 2026. The requirement was not there in the LDP plan to 2016 adopted not long ago. This early development has not been justified on the basis of employment need.</p> <p>The Core Strategy is required to give clarity – it is not its purpose to defer important decisions to the AAP process such as carrying out a small scale Green Belt review or increasing the housing at the Northern Gateway to 500 units.</p> <p>In the current economic recession 20,000m2 of commercial space will impact the proposed office space in the Westgate development, the part-empty Cowley Centre, the approved expansions at the Peartree service area, as well as being affected by the Evergreen 3 proposals.</p>	
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	<p>SHLAA UR1B forecast to deliver housing during 2010/16 have since been granted planning permission for student accommodation, so this puts at risk meeting housing targets.</p> <p>Table 4: this evidence base is fundamentally flawed and unreliable. Oxford City Council's website is currently showing 117,000 jobs in Oxford, but this table states that after an increase of 13,900 jobs as a result of the development proposals in the Core Strategy there will only be 115,800 jobs by 2026.</p>			
<p>Oxfordshire County Council CR3</p>	<p>Section B: 1 rep (CR3/001/1B) The Oxfordshire population and household forecasts produce lower estimates of future population and economically active.</p> <p>While trends are relevant, it is important to understand the scale of the imbalance in both actual numbers and percentage terms. Traffic congestion in and around Oxford is a consequence of the pull of Oxford for jobs. Too fast and/or high an increase in jobs will worsen the situation.</p> <p>Sections C and D: 2 reps (CR3/002/1C, CR3/003/1D) Overall on jobs we consider the City Council's estimates to be conservative and could be exceeded. According to the Annual Business Inquiry (ABI), jobs in Oxford increased by 7,800 in the two years between 2006 and 2008, which is similar to the level forecasted by the City Council for 10 years.</p> <p>According to the AMR 2009, land completed for employment totalled 85,885</p>	<p>FC6 and FC7: 2 reps (CR3/004/FC6, CR3/005/FC7) Remain concerned about the impact on the economic fortunes of Bicester if employment at this site is developed early in the plan period.</p> <p>Concerned about how the dwellings proposed in this location could develop into a sustainable community where people would want to live. Proposed Policy CS6 does not acknowledge the need for supporting services and facilities that 200 new dwellings would require.</p> <p>A key issue for the County Council would be the impact of additional pupils generated by new housing development on the demand for school places. The lack of phasing for the 200</p>	<p>Issue B: 1 rep (CR3/008/3B) We believe that any improvement in the housing/employment balance is marginal.</p> <p>Issue C: 1 rep (CR3/009/3C) The justification for increasing the number of dwellings to 200 is somewhat arbitrary. The housing element of the Northern Gateway proposed development is not a requirement and no phasing is suggested. This lack of detail would create uncertainty for the County Council in terms of planning supporting infrastructure, such as school places.</p> <p>Issue D: 1 rep (CR3/010/3D) We have always been of the view that the proposed SDA should have been developed as a community with its own range of supporting services and facilities. Thus, we would not agree wholly with the first sentence of paragraph 3.16.</p>	<p>1 rep (CR3/012/4) Object to the reference to possible housing in the green belt in the new text for s3.4 of the Habitats Regulations Assessment (paragraphs 4.3 and 4.6). The proposed text in these paragraphs refers implicitly to a green belt review to accommodate the potential housing at Northern Gateway, which would be dealt with under the Northern Gateway AAP and to which we are opposed as the case for exceptional circumstances has not been proven.</p>

	<p>sq metres, the majority of which was developed for B1 use. 3,700 jobs could have been created from this level of completions alone. We consider employment generation in the city has been robust despite some land loss.</p> <p>It seems highly likely that take-up rates at other city locations (in addition to the Science Park) will slow. If take-up rates are slow elsewhere, we must assume that land for employment development will be available later in the Plan period.</p>	<p> dwellings at Northern Gateway creates difficulties in planning education provision, especially for primary school places, for which there is Oxford wide capacity issue. If the proposed Northern Gateway dwellings and other sites in this area were to be developed in the same timeframe we would have great difficulty in satisfying demand for primary school places.</p> <p>If Inspector is minded to allocate Northern Gateway, we recommend that Policy CS6 and its supporting text is amended to stipulate that development for Class B1 uses will provide for employment needs after 2016 and will be phased to provide employment opportunities beyond the Plan period, unless monitoring demonstrates an overriding need for the release of employment land before the end of the Plan period.</p> <p>Also recommend adding “and appropriate supporting infrastructure, services and facilities” after complementary residential development.</p> <p>FC19: 1 rep (CR3/006/FC19) Should reflect the full wording of paragraph 22.7 of the South East Plan with insertion of the words “and main settlement” between “sub-regional” and “level” to clarify that achieving</p>	<p>Issue G: 1 rep (CR3/011/3G) Agree that City Council should plan for development within its own boundaries and that no contingency is required to deal with possible reinstatement of the SOSDA.</p>	
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		<p>an improved balance applies to Oxford in its own right as well as across the sub region as a whole.</p> <p>FC33: 1 rep (CR3/007/FC33) Opposed to housing proposed in Green Belt, as shown in Appendix 4.</p>		
<p>Sean Feeney 00090</p>		<p>Various FC's: 1 rep (00090/001/FC) There is an unresolved cross-boundary dependence in the Core Strategy; Oxford City Council's policy support for SOSDA in South Oxfordshire District Council. I submit that South Oxfordshire District Council's representations and, in particular, its judicial review of the South East Plan are evidence that Oxford City Council failed to resolve this cross-boundary dependence before the submission of its Core Strategy.</p> <p>PINS procedural guidance states that "a site is strategic if the delivery of the Core Strategy is dependent on it". I therefore submit that it is not possible to delete a strategic site without finding the whole Core Strategy unsound. I submit that the City Council's proposed deletions of references to SOSDA are therefore evidence that its whole Core Strategy is unsound.</p>	<p>Issue E: 1 rep (00090/002/3E) There has been a material change in circumstances with a new Government that has announced it will abolish Regional Spatial Strategies. The Examination should not be resumed until the implications of this policy and projected rapid abolition of RSS's are known. In particular, there should be no resumption until any transitional arrangements for the effects of the abolition of RSS's are known. This announcement is also likely to affect the judicial reviews to the South East Plan.</p> <p>Given the reason for the new hearings is, ultimately, conformity with a RSS that is so fundamentally flawed the former Sec of State did not even defend a legal challenge, and that it is highly likely that RSS's will be abolished by July when the hearings are scheduled to begin again, the reasons for the hearings appears to be redundant.</p> <p>Issue F: 1 rep (00090/003/3F) The Core Strategy is supposed to be a robust long-term policy lasting until 2026. Because of the new</p>	

			<p>Government's announcement that RSS's will be rapidly abolished it is safe to assume that a 'general review of the Green Belt around Oxford' will not now take place. It was open to Oxford City Council to argue during the Core Strategy that there are exceptional circumstances for a wider Green Belt review around Oxford; it has failed to do so. Such a policy change is now also contrary to the stated policy of HM Government. Oxford City Council should not be further indulged by allowing it any further opportunity to argue for a wider Green Belt review.</p>	
<p>Mrs Gwen Scott (Chair of Governors Wolvercote Primary School) 00200</p>			<p>Issue C: 1 rep (00200/001/3C) Share the concerns of others regarding the pressure and dangers that increased traffic will cause. But it is the impact on local primary school places that is a particular concern. The Head and Governors are not satisfied as to the competence of the LEA in predicting both timing and numbers of potential pupils wishing to enter the school and living within the catchment area. Request Inspector to make particular reference to the need for the County Council's demographic research to be considerably improved so as to allow the capacity and facilities of schools to more accurately relate to the needs of families, adjusting catchment areas as required and in time to make appropriate provision.</p>	

<p>Nicholas Lawrence CR1427</p>			<p>Issue C: 1 rep (CR1427/001/3C) In view of the present excess of jobs over active residents, and the high land and property prices, the proposed 'Northern Gateway' development is unsound. It would have unwelcome effects on the important green spaces at Port Meadow and Cuttleslowe. It does nothing to improve the grim aspect of the land around Pear Tree. At most, some modest and well-landscaped housing might be appropriate.</p>	
<p>Mark Pitt 00198</p>		<p>FC1: 1 rep (00198/001/FC1) The Barton West development on the Key Diagram includes as proposed area of search a section of the Headington Conservation Area immediately south of the A40. This includes an exceptionally pretty footpath and field immediately below Ruskin College, and should be removed immediately.</p>		
<p>David Fyson 00203</p>	<p>Section A: 1 rep (00203/001/1A) Targets for housing set by the regional development agency are to be scrapped (along with the agency itself). Therefore a lot of the current proposals for housing expansion will need to be revised along a more sustainable growth path.</p> <p>Section C: 1 rep (00203/002/1C) Land at both the Oxford Business Park and Oxford Science Park is currently used inefficiently with a large proportion being taken up by car parking. Efficient use of the land is likely to enable higher levels of unemployment if this has not already been</p>	<p>FC7: 1 rep (00203/003/FC7) What is the meaning of "Oxford's established and emerging clusters"?</p>	<p>Issue C: 1 rep (00203/004/3C) Although there has been strong local opposition to the "Northern Gateway" it still remains in the document. All references to it should be removed as it does not constitute a sustainable development.</p>	

	<p>taken into account.</p> <p>The document also does not make any assumptions about the greater use of home working. This does not necessarily have to relate to the self employed with more and more companies providing the means for home working.</p>			
<p>Magdalen College and Thames Water 00059</p>		<p>FC8: 1 rep (00059/001/FC8) Suggest wording to provide for the contingency whereby the SDA is to be delivered as part of the development plan.</p> <p>Policy CS8 to be the subject of a caveat at the beginning with the insertion of the following wording <i>'In the event that the South East Plan provides for it, the City Council will....'</i></p>	<p>Issue F: 1 rep (00059/002/3C) Magdalen/Thames have consistently been of the view that the Core Strategy should make provision for the South Oxford SDA.</p> <p>Since the Procedural Meeting there have been no further statements from GOSE/Treasury Solicitor or other parties engaged in the negotiations to indicate how/if these are proceeding. We understand that from our discussions with the Treasury Solicitor, however, that matters are not progressing well, with the various parties yet to reach agreement. It is understood that an issue yet to be resolved is whether the requirement for 4,000 houses should be deleted from the SEP.</p> <p>We acknowledge that a further level of uncertainty has been introduced by a change of national Government. In its document 'The Coalition: our programme for government', published on 20th May 2010, the coalition confirm the manifesto commitment to abolish RSS's. However, the necessary primary legislation has not been introduced to achieve this change to the</p>	

			<p>development plan hierarchy. It is assumed therefore that the Inspector will continue to undertake his examination of the soundness of the Core Strategy on the basis that it should be in conformity with the South East Plan (as the relevant RSS).</p> <p>In the present circumstances therefore, Magdalen/Thames submit that it remains right for the Core Strategy to recognise the present status of the SEP and the possible outcomes to the legal challenge, including the option of an SDA to the south of Oxford.</p>	
Silke Schaeper 00207	<p>Section A: 1 rep (00207/001/1A) Not convinced that a “broad brush” approach, and the admission that “figures can vary widely depending on the particular methodology used”, are confidence-inspiring. Proposals are being made to build on greenbelt land including meadows displaying medieval furrows.</p> <p>Paragraph 1.10 is a token statement that does not reflect the problems this city has, which are a severe shortage of affordable and social housing and a shortage of non-academic jobs. The Northern Gateway development wouldn’t address either, because it would supply very little affordable housing and jobs mainly for academics or academically trained workers that would commute to North-Oxford.</p> <p>Section C: 1 rep (00207/002/1C) The FPC has not sufficiently taken into</p>	<p>FC7: 1 rep (00207/003/FC7) The impact of complementary amenities on the local infrastructure, transport, congestion, pollution, wildlife habitat etc would be very large. The information complementary amenities is too vague. What about the emergency services? Do they want to move to the site at all?</p> <p>FC26: 1 rep (00207/004/FC26) It is not clear whether groups not solely linked to SOSDA will continue to be consulted and involved, including those in adjacent counties.</p>	<p>Issue C: 1 rep (00207/005/3C) By referring to peak hour traffic movements, the FPC document acknowledges that most users of the projected Science Park would indeed arrive and leave by private car not public transport.</p> <p>There is already provision for future development on the site of the former Wolvercote Paper Mill; building 200 houses on this site would have considerable implications for the local infrastructure. This site will also need to include provision for local employment.</p> <p>Residential development and complementary uses ought to be phased too, in order to ensure that development is in synch with the</p>	<p>1 rep (00207/006/4) Points 4.2, 4.3, 4.8 contain many inaccuracies. Planning officers clearly need to do more research and site visits in order to fully appreciate what impact the Northern Gateway proposal would have on local residents, popular recreation sites, and on traffic to and through the area.</p>

	<p>account the recession, and therefore floor space calculations for the Northern Gateway remain objectionable. I wish to point out that in the FPC itself it is stated at 1.7 that “the impact of the credit crunch is not fully understood yet”.</p> <p>I also find it objectionable that the Council relies on data relating to the Oxford Science Park obtained from Savills, a land agent with vested interests. Savills are not only the land agent for Magdalen College and Thames Water Property, but also for St John’s College, one of the land owners involved in the Consortium that wants to develop the Northern Gateway.</p>		<p>needs of the local community.</p> <p>Decisions on a Northern Gateway AAP are very much premature. They should not be referred to in the Core Strategy.</p>	
<p>Bus Users UK Oxford Branch CR295</p>	<p>Section B: 1 rep (CR295/001/1B) Even if the imbalance between jobs and housing becomes less acute, overall growth in population and vehicle numbers may cause the amount of demand for housing and road space, and the numbers commuting from outside Oxford to work in Oxford, to remain at least as high or even increase. Paragraphs 1.15 and 1.16 should be amended to acknowledge this.</p> <p>Section C: 1 rep (CR295/002/1C) Paragraphs 1.19-1.23 do not quantify how many square metres of commercial space in Oxford are currently unoccupied, this information should be included in the document. Re. paragraph 1.28 the City Council should identify how much land would need to be converted from employment land to housing to eliminate the current jobs/housing imbalance, and identify sites where such conversion would be appropriate.</p>	<p>FC5: 1 rep (CR295/003/FC5) Unsound for similar reasons to paragraphs 1.15, 1.16 and 1.30.</p> <p>FC7: 1 rep (CR295/004/FC7) Northern Gateway proposals remain wholly unjustified. Policy CS6 and all other references to it should be deleted from the Core Strategy.</p> <p>FC10: 1 rep (CR295/005/FC10) Any policy to predict and provide for this level of employment within the confines of Oxford’s unusually restricted geography is unsound and unjustified.</p> <p>FC18: 1 rep (CR295/006/FC18) Ineffective for similar reasons to paragraphs 1.21 and 1.22</p>	<p>Issue A: 1 rep (CR295/010/3A) Oxford City Council remains inconsistent as to whether deletion of the South Oxford SDA significantly affects the Core Strategy.</p> <p>Issue C: 1 rep (CR295/011/3C) Proposed increase in housing seems not to accord with remarks by City Council Planners at the EiP that apart from a strip of land to the south of the A40, the Northern Gateway site is too isolated from facilities and residential areas to be a housing site. In addition, Wolvercote’s primary school has neither the capacity for more children nor space to expand to provide such capacity. Nor is the Northern Gateway a safe or suitable place to build a new primary school. The revised proposal seems ill-advised and impractical.</p>	<p>1 rep (CR295/013/4) Paragraphs 4.3 and 4.4 are untrue. There is a car park on the lower side of Wolvercote with a riverside picnic area, public WC and direct access onto Wolvercote Common and Port Meadow. Also from Godstow Road between Lower Wolvercote and the railway line there is direct access to Wolvercote Common, which is contiguous with Port Meadow. This access includes a bridleway and cycle route that meets Godstow Road opposite Elmthorpe Road.</p>

		<p>FC19: 1 rep (CR295/007/FC19) It should be noted that the South East Plan does not require Central Oxfordshire's employment growth to be in Oxford either. Oxford has no direct obligation to provide for significant job growth.</p> <p>FC28 and 32: 2 reps (CR295/008/FC28, CR295/009/FC32) These retain references to siting emergency services at the Northern Gateway. Latest indications are that no emergency services currently seem likely to move there.</p>	<p>Reduction on employment floorspace proposed for Northern Gateway is merely the lower end of the range of total floor area proposed previously, therefore it meets none of the previous Examination objections.</p> <p>Issue F: 1 rep (CR295/012/3E) Neither the City Council nor any other party has provided no credible justification for expanding Oxford enough to require building on Green Belt land.</p>	
<p>Wolvercote Commoners Committee 00096</p>	<p>Section C: 1 rep (00096/001/1C) Point 1.22 refers to Oxford Science Park take up possibly being completed by 2019/2020, delay being due to recession. We would maintain that providing further such floor space at Northern Gateway is similarly subject to recession, possibly not required, and is therefore ill-advised at this time.</p>	<p>FC7: 1 rep (00096/002/FC7) The impact and implications of complementary uses are large in terms of local infrastructure, transport, pollution, habitat etc yet these remain vague</p> <p>FC26: 1 rep (00096/003/FC26) Unclear whether groups not solely linked to the SDA will continue to be involved, including those in adjacent counties</p>	<p>Issue C: 1 rep (00096/004/3C) The previously raised concerns over traffic are not addressed. Any development should be phased to prevent oversupply of facilities and/or irreversible development decisions.</p> <p>Decisions/directives on an Area Action Plan are premature and should not be referred to in the Core Strategy.</p>	<p>1 rep (00096/005/4) Points 4.2, 4.3 and 4.8 contain inaccuracies and should be completely revised.</p>

Responses that raise points which are not the subject of the Further Proposed Changes

Respondent	Summary of response
Mr Rodrigo 00047	<p>2 reps (00047/001/GEN1, 00047/002/GEN2)</p> <p>1) Although the Key Diagram has been amended to show a public transport link between Rose Hill and Cowley Centre, there is no guarantee that the service will be permanent. This link is essential as the Rose Hill estate is being redeveloped, doubling the number of houses. It will give access to the shopping centre, hospital, schools, leisure facilities and job prospects.</p> <p>2) Ideally Cowley Centre – due to its location and accessibility from neighbouring areas – should be considered as the Primary Centre, not Blackbird Leys. Why was Blackbird Leys chosen to be the Primary centre?</p>
Friends of Warneford Meadow CR1455	<p>2 reps (CR1455/001/GEN1, CR1455/002/GEN2)</p> <p>1) Since the last hearing Warneford Meadow has been registered as a Town Green and the development designation should therefore be removed from the Proposals Map.</p> <p>2) Oxfordshire County Council designated a part of the Southfield Golf Course as a Local Wildlife Site in March 2010 and we would like to see the Proposals Map updated.</p>
Headington & St Clements Residents Associations 00117	<p>3 reps (00117/001/GEN1, 00117/002/GEN2, 00117/003/GEN3)</p> <p>1) The proposed Core Strategy is completely inadequate in its analysis of traffic flows, both historically to assess the increases without any further developments, and also as a result of the proposed Core Strategy developments. Many through routes are on residential streets that have already suffered from an unacceptable incremental growth in traffic. The capacity of many of Oxford's roads is already at its feasible limit. The Core Strategy document is not, therefore, an acceptable document on which to plan the development of Oxford.</p> <p>2) Changes to the status of two 'green' areas in East Oxford/Headington There are two changes of note, implying that no development can take place in the following areas: 2.1. Warneford Meadow, which has been granted Town Green status. 2.2. Large parts of Boundary Brook and Southfield Golf Course, which have been granted County Wildlife status.</p> <p>3) The recent consultation has been inadequate, having been largely confined to a limited request by means of existing internet contacts.</p>
Friends of Old Headington CR325	<p>1 rep (CR325/001/GEN)</p> <p>Request formal consultation with the Friends of Old Headington and residents of the village. Access between Marston/Northway, the A40 and West Barton must include private cars and other vehicles as well as buses and emergency vehicles. The provision of social amenities must be provided in West Barton, including a public house. Access across the proposed footbridge over the A40 between West Barton and Stoke Place must be restricted to pedestrians and bicycles, and it must be made illegal for motorbikes to use this route.</p>

Councillor John Goddard 00165	<p>1 rep (00165/003/GEN)</p> <p>The proposed changes have received no authorisation from the City Council. They are no more than officers' responses without political backing and without due process from the political decision-making arrangements of the Council's constitution.</p>
Mark Pitt 00198	<p>1 rep (00198/002/GEN)</p> <p>Unaware of any consultation with residents of Old Headington and associated organisations. The physical location of the Barton West development would shut out future residents from easy access to the city and other communities. Any reasonable interpretation of human rights would recognise this as unfair. The area is noisy and poorly located, it makes no sense to select an area simply as it happens to fall within the city boundaries. Concerned about transport links and added congestion. Proposed percentage of social housing should be reduced from 50% to say 20%.</p>
Nicola Blackwood MP 00168	<p>2 reps (00168/008/GEN1, 00168/009/GEN2)</p> <p>1) Concerned by the omission in the document of much discussion of housing at the Land at Summertown. The deletion of SOSDA would appear to increase the pressure to build elsewhere in the City, in particular the Summertown site, but the document specifically ignores this except for a passing mention at para 4.10.</p> <p>2) No evidence of whether the City Council has taken legal advice from a QC, as encouraged by the Inspector at the Procedural meeting in February.</p>
Oxfordshire Green Party CR1589	<p>1 rep (CR1589/012/GEN)</p> <p>We feel that with a new government in place and all the pressures for change it is time to go back to the drawing board and come up with a realistic forward-looking Core Strategy. We do not think that tinkering around with the strategy and limiting consultation is the right way forward.</p>
Engage Oxford 00001	<p>5 reps (00001/009/GEN1, 00001/010/GEN2, 00001/011/GEN3, 00001/012/GEN4, 00001/013/GEN5)</p> <p>1) The Inspector recommended that the City Council take independent legal advice. There is no mention of this in the document.</p> <p>2) Chiltern Railways have formally announced that the proposal in the vicinity of the Northern Gateway, 'Evergreen 3', will include a parkway station at the Grain Silo, with further major implications for traffic congestion</p> <p>3) The whole of Oxford city has been designated an Air Quality Management Area. Policy CO3 of the South East Plan will affect the delivery of policies in the Core Strategy.</p> <p>4) The extent of the current recession will call into question whether the plans and policies are deliverable against declared timescales of development by 2016 and 2026.</p> <p>5) Cherwell District Council have published their Core Strategy submission document and West Oxfordshire District Council has issued an interim position statement. This is not recognised in statement 3.14.</p>
Graham Jones 00199	<p>1 rep (00199/005/GEN1)</p> <p>The possibility of housing development north of The Cherwell School has not been properly considered or discussed. It is in the Cherwell Valley flood plain and has very limited access to the Marston Ferry Road and Summertown.</p>

Sean Feeney 00090	<p>2 reps (00090/004/GEN1, 00090/005/GEN2)</p> <p>1) Concerned that Inspector Fenton made a misdirection on compliance of the Core Strategy with the Sustainability Appraisal.</p> <p>2) The initial Core Strategy was accompanied by an evidence base gathered over several years. I submit that this original evidence base is no longer robust because of the enormous changes of economic circumstances and because of its age. The original evidence base contained specially commissioned consultants reports that are now several years out of date, e.g. Oxford Employment Land Study. The evidence base accompanying the Further Proposed Changes does not contain consultants reports of equivalent weight, but relies heavily on the Annual Monitoring Report data. This has been the subject of extensive criticism by Rosemary Harris and Engage.</p>
Heather Armitage 00156	<p>4 reps (00156/001/GEN1, 00156/002/GEN2, 00156/003/GEN3, 00156/004/GEN4)</p> <p>1) Land designated for allotment use, including so-called disused allotment sites at Minchery Farm, Binsey, Abingdon Road and Horspath Road should remain reserved for allotments. The supply of allotments is failing to meet current demand.</p> <p>2) Brookes University is expanding too rapidly, taking over green spaces and family housing. It has become too large and swamped the Headington community like a cuckoo in the nest.</p> <p>3) Preservation of Oxford's green spaces is of paramount importance – to create 130 tarmac parking places on a formerly open green space and sports field is a ridiculous misuse of green space. This is being done adjacent to Warneford Meadow. The SLINC status of important wildlife areas of the city should be maintained and strengthened.</p> <p>4) There should be provision for an open air free to use skate and bmx park. It is ludicrous there is no such provision in Oxford and children and young people have to take their chances riding on roads and in the urban environment.</p>
Paul Wilson CR1456	<p>2 reps (CR1456/001/GEN1, CR1456/002/GEN2)</p> <p>1) My only major concern is that the impacts of the huge government deficit - and the consequential savage cuts to public expenditure and/or increase in local and national taxes over the next few years do not seem to have been taken into account.</p> <p>2) Of more minor note - transport costs are rising ahead of inflation and undoubtedly will continue to do so - have the full impacts of the knock on behaviour changes been taken fully into account? I'm thinking of a) People wishing to move nearer to jobs and schools; b) Changes in usage of modes of transport; c) More remote working/teleworking.</p>
Fredric W Taylor 00204	<p>1 rep (00204/001/GEN1)</p> <p>The need for such excessive growth should be questioned and not accepted as input. Oxford should remain a small, historic, university city.</p>
A J Schiff 00205	<p>1 rep (00205/001/GEN1)</p> <p>How about trying to ease the congestion by promoting cycling a lot more than is currently done. At the moment there are a few hundred meters of cycle lanes here and there. Some better than others. What we need is a large car park on the outskirts of the city (Park and Ride ones), where it is free(!) to park and then a very good cycling network all over the city, so that people can get to their workplace. It would be nice if Oxford can move closer to being a truly bike-friendly city. The faster the better.</p>

Sarah Lasenby CR185	1 rep (CR185/001/GEN1) Am specially concerned to know whether the impact of so many houses would have on transport and the city centre? I have read the papers and I have not found any comments about transport and the impact the increased population would have on managing the buses in the centre of town.
Elizabeth Sheppard 00206	1 rep (00206/001/GEN1) How about making this document a bit more accessible to the general public? I am a fairly well educated person but gave up after a few pages. This is largely gobbledegook to your average person in the street so doesn't bode well for your 'consultation'
Harriet Fishman 00201	1 rep (00201/001/GEN1) Extra housing, if built, should include local amenities such as schools, shops, a pub, a cinema, so as to minimise traffic travelling to such amenities elsewhere.
Raph Moroney 00202	1 rep (00202/001/GEN1) Sounds reasonable to me, I think the population would go up, and it is a good idea to build as many houses as possible.
Felicity Steadman CR623	1 rep (CR623/001/GEN1) Would like to see as many Brownfield sites redeveloped for both commercial/employment and residential purposes before any Greenfield sites are reduced. Planning applications for sub-division and development of residential properties within Oxford should also be encouraged.
Silke Schaeper 00207	3 reps (00207/007/GEN1, 00207/008/GEN2, 00207/009/GEN3) 1) Very concerned that Inspector Fenton's report has not been made available to the public. 2) Would like to know whether it is due and proper procedure that the Northern Gateway Consortium has indicated that it would make payments to the Council in case the Northern Gateway plans were approved, so that the planning department could hire additional staff to deal with the added workload the development would create. 3) Consultation on the FPC has been too limited and not up to the standards of the Highways Agency or Chiltern Railways. Also concerned that planning officers might vet representations before they reach the Inspectorate.
Bus Users UK CR295	6 reps (CR295/013/GEN1, CR295/014/GEN2, CR295/015/GEN3, CR295/016/GEN4, CR295/017/GEN5, CR295/018/GEN6) 1) Paragraph 1.24 cites no evidence that Oxford city centre needs any increase in retail space. Total retail floor space should be limited close to current levels. The Westgate Centre redevelopment should be revised to stay within this limit and to allocate as much of the site as possible to new city centre housing. 2) Paragraph 1.25 should be modified to stop all expansion of hospital capacity in East Oxford, and should add a policy to encourage some functions or departments to move away from Oxford. 3) The Key Diagram should additionally show the proposed Water Eaton Parkway Station. 4) The Core Strategy's employment policies should be amended if the proposed orbital bus service is to be effective. 5) Account should be taken of limitations on funding for schemes to reopen the Cowley branch Line. The Core Strategy should include a policy to support the

	<p>County Council in a bid for DfT funding for a light rail system in Oxford, including the Cowley branch line.</p> <p>6) Paragraph 3.14 is unsound in that it claims “Cowley centre... has good accessibility by all modes of transport.” This is incorrect. Welcome provision of new bus route 20 between Cowley and Rose Hill and provision of Sunday service on route 12, but still dissatisfaction with other routes serving Cowley. The retail heart of Cowley has no public parking bays or security fixtures for motorcycles.</p>
<p>Wolvercote Commoners Committee 00096</p>	<p>2 reps (00096/006/GEN1, 00096/007/GEN2)</p> <p>1) The table on p36 refers to housing sites, such a site has been proposed on the Wolvercote Paper Mill. The local infrastructure is unlikely to be able to sustain this development, in particular the local school.</p> <p>2) Re point 3.4, it is hoped that the Mill site development will include some local employment.</p>

Responses indicating no specific representations to make or reiterating previous representations

Respondent	Summary of response
English Heritage CR27	No specific representations to make at this stage
Sport England CR95	No comments to make on the proposed changes
The Coal Authority 00040	No specific comments to make on this document at this stage
The Theatres Trust CR137	Note changes to policy numbers in FC24. No particular comments to make on other changes to the document
South East England Partnership Board CR1	SEEPB does not wish to make any further representations on this document
Highways Agency CR346	The Further Proposed Changes do not alter the HA’s representations set out in October 2008 (in response to response to the pre-submission consultation), May 2009 (in response to the Proposed Changes), June 2009 (written representations to Matters 6, 7 and 8), and December 2009 (on the progression of the legal challenge to the Regional Spatial Strategy). The HA maintains its representations to the Core Strategy, notwithstanding the proposed changes to the Core Strategy which principally address the issues regarding the SOSDA, and a lower threshold of Class B uses at Northern Gateway.
Councillor Nuala Young CR1600	My previous comments still stand