

## **OXFORD CORE STRATEGY**

**Procedural Meeting on 11<sup>th</sup> January 2010**

### **Response to Inspector's request from the OXFORD GREEN BELT NETWORK**

The aims of the Oxford Green Belt Network are to protect the Oxford Green Belt from inappropriate forms of development and to promote interest in the benefits of the Green Belt. Our position with regard to the Core Strategy is that planning should accommodate Oxford's needs within the City's existing administrative boundary and that employment growth in knowledge-based industries should be shared with the expanding towns of central Oxfordshire beyond the Green Belt.

The City Council's statement that deletion of the SDA would have only limited implications for the Core Strategy suggests to us that the SDA was unnecessary in the first place. That being the case, we would hope that a condition of the inquiry into the Core Strategy continuing would be that no reference is made to urban extensions beyond the City boundary, to the south of Oxford or anywhere else. This would be consistent with the outcome of the legal challenge to the South East RSS which has resulted in the deletion of those paragraphs on Central Oxfordshire which refer, not only to the SDA south of Oxford, but also to the need for strategic or wider reviews of the Green Belt.

The City Council's statement that there would be a need to re-allocate the 4,000 houses (from the SDA) elsewhere in Central Oxfordshire would appear to conflict with the above statement that deletion of the SDA would have only limited implications. We believe that any housing needs in excess of the 8,000 allocated to the City in the RSS should be met within the City, perhaps by the pursuit of less ambitious policies that might yield sites for more houses. We were dismayed recently, for example, to learn that the Council was considering reducing the amount of housing proposed in the Westgate re-development in order to fit in a supermarket.

We regard the Northern Gateway proposals as another example of over-ambitious development that, because of the emphasis there on employment, can only make the housing/employment imbalance worse. The idea of phasing seems to be an admission that the Northern Gateway scheme is bound to create problems. Additionally, we are opposed to the inclusion of areas of Green Belt within the Northern Gateway proposals which seem to us to be quite unnecessary and to be included only to make the sites more attractive for development. We therefore have to question whether the Northern Gateway should remain a policy of the Core Strategy.

We are as protective of the Green Belt within the City as with that outside it, and we hope that deletion of the SDA does not open up any debate that would make the existing areas of City Green Belt vulnerable to development. We regard the Cherwell Valley between Marston and Summertown in particular as needing strong protection and, in this context, we are also strongly opposed to development of the Summertown Safeguarded Land which, in our view, should never have been removed from the Green Belt.

We hope that if the inquiry into the Core Strategy were to be resumed it would be informed above all by the need to protect the City's historic townscape and the Green Belt setting which complements that townscape. We recognize the need to address housing and other issues but are mindful of past inquiries which have concluded that there should be limits to Oxford's growth. The City's attractions result in strong development pressures which, if not restrained through the planning system, will only create further problems.

#### Conclusion

In the light of the deletion of the SDA we question whether the inquiry into the Core Strategy should resume unless (1) any suggestion of an urban extension beyond the City boundary is dropped, (2) serious attempts to achieve a better housing/employment balance are sought by abandoning the Northern Gateway, and (3) it is accepted that the Green Belt and other open spaces, especially in the Cherwell Valley, should be left as they are.

Dr D.I.Scargill  
Chairman, Oxford Green Belt Network  
[REDACTED] Oxford [REDACTED]  
[REDACTED]

## **County Council Officer Response - January 2010**

### **Oxford City Core Strategy Examination:**

#### **Response to Inspectors questions Nov 09**

##### ***Procedure***

1. There is a risk that uncertainty over the South Oxford Strategic Development Area (SOSDA) could cause delay in enabling and providing much needed housing for Oxford. Rather than risk this, we believe that a Core Strategy should be developed for Oxford (based on the assumption that SOSDA is not going to happen). This will enable the City Council to develop a strategy to provide housing and infrastructure and appropriate job opportunities and assist in reducing the housing/jobs imbalance sooner rather than later.
2. If a Strategic Development Area (SDA) were to be approved at some point in the future it would almost certainly fall largely or wholly outside Oxford City. It would therefore need to be planned by another local planning authority. Any new SDA would need to work in its own right, and have the appropriate transport connections, jobs and community infrastructure. In deciding any location for an SDA it would be important to make sure that it contributed to agreed objectives for Oxfordshire as a whole, rather than worked against them. This potential outcome need not delay development of an appropriate Core Strategy for Oxford. Therefore, the County Council believe that progress can be made with the examination of the Oxford Core Strategy, without waiting for resolution of the legal challenge relating to the SOSDA.

##### ***Implications of the legal challenge relating to the SOSDA for the Core Strategy***

###### ***Jobs housing balance***

3. Reducing the housing/job imbalance has been an accepted planning objective for Oxford over several plan periods and is reiterated as an objective of the South East Plan (SEP) paragraph 22.9, 'within Oxford the overall aim should be to achieve a broad balance between housing and jobs.'
4. If the SOSDA does come forward, it would significantly contribute to Oxford's housing needs and help improve the balance between housing and jobs; conversely if the SOSDA is dropped from the SEP, the housing/jobs imbalance would be worsened. The table that the City Council presents in their recent submission to the Inspector's questions (Nov 09) shows a job/housing imbalance for 2006 of 1.275 and of 1.283 for 2026 (high growth scenario) i.e. the imbalance would worsen under the high growth scenario, contrary to Para 22.9 of the SEP.

5. Without the SOSDA, the available labour supply to serve the potential job growth in Oxford over the Core Strategy period would be significantly diminished.
6. Using the latest employment growth figures, the jobs/housing balance is potentially greater than the City Council have presented in their findings. Results from the Government's Annual Business Inquiry (ABI) have been released for 2008. These show that job numbers in Oxford grew by 7.9%, from 99,966 to 107,833 in the two years between 2006 and 2008 -, a total of 7,867. The SEP's monitoring target for Oxford for the period 2006 to 2016 is about 7,100 jobs<sup>1</sup>. Findings from monitoring of land completed for B1 development show that Oxford is performing well above the other main settlements in the county, reflecting the growth seen from the ABI results. The recession will impact on job creation; however, looking to the longer term, the potential for Oxford to perform strongly should not be underestimated. Available up to date information shows that Oxford's job market is growing at a rate that could potentially worsen the already existing imbalance between jobs and housing.
7. In essence, the County Council's views on the need to improve the job/housing imbalance in Oxford remain unchanged from those expressed earlier in the examination process. The type, scale and timing of employment provision in Oxford should be carefully considered. To help achieve a sound spatial strategy the Core Strategy needs to include the following:
  - a) a significant reduction in the scale of planned employment at Northern Gateway and the deletion of a the proposal for a small scale review of the Green Belt at Northern Gateway - this change would avoid perpetuating the present housing/jobs imbalance in the City
  - b) the timing of any employment land coming forward at Northern Gateway should provide for the employment needs of Oxford to 2026 and beyond. Whilst there remain amounts of employment land available around the City it would be prudent to withhold the release of the Northern Gateway land. This would allow for a review of the Core Strategy in terms of where any new housing developments have been allocated elsewhere in Central Oxfordshire

### *Contingency*

8. It is the County Council's view that there is no overriding need for contingency sites to be released for housing in Oxford for the following reasons:

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<sup>1</sup> South East Plan Supplementary Guidance: Employment Land Reviews, South East England Partnership Board, 2009

- The City Council has indicated it is likely that housing development in Oxford will exceed SEP housing targets for the district in policies H1 and CO3
  - The supporting text to SEP policy CO4 states that “If overwhelming evidence demonstrates the unsuitability of the initial search area, the Central Oxfordshire authorities will ensure a wider review (the form and extent of which will be agreed with GOSE) takes place in order to identify and deliver one or more alternative suitable locations by 2026”. There is no requirement for an allocation to be made in Oxford itself as a contingency
9. The City Council’s response to the Inspector’s questions refers to an option of changing the mix of uses at the Northern Gateway to cap the Class B related uses and increase the extent of housing on the site. The Northern Gateway Consortium indicated at a recent meeting with the City Council that their site could accommodate up to 500 dwellings. This scale of development would have implications for the provision of school places. If the Inspector were minded to include additional housing as a contingency option at the Northern Gateway, it must be made clear in the Core Strategy that this would be subject to the provision of necessary supporting infrastructure (both contributions and any land requirement).
  10. At the examination in July we outlined the potential for expansion of schools closest to Northern Gateway and Summertown sites. In all cases except one those schools are already full at their current capacity. All areas of the City are currently experiencing considerable pressure on places due to changing demographic trends and the economic downturn. Places in North Oxford and Summertown are traditionally some of the most oversubscribed in the City and there is limited ability to expand provision at Cutteslowe Primary, St Nicholas CE Primary, Marston and New Marston Primary schools. Expansion of St Nicholas CE Primary School has already been approved to cope with existing and further anticipated pressures.
  11. Any significant increase in the number of dwellings to be built at Northern Gateway to 400 or 500 will become unsustainable in terms of existing schools infrastructure and there would be a need for a new 1 form entry primary school. In this case the Core Strategy would need to allocate a suitable school site and require its funding from development.

Laura Peacock 04 December

## **Implications of the Removal of South of Oxford Strategic Development Area as a Strategic Planning Proposal affecting Oxford – Oxfordshire Green Party.**

The Oxfordshire Green Party was disappointed with the Core Strategy which is supposed to guide development in Oxford until 2026, a period when there will be severe challenges which are little considered by the Strategy. Among these challenges are climate change, pressure on commodities including both oil and food, and problems with the economy requiring severe cutbacks in public spending which are likely to last at least a decade. The general precariousness of the British economy which has been based on a property and financial boom, and has a relatively unsubstantial manufacturing base, also has implication for economic growth. The Strategy in our view lacks any overall vision besides attempting to meet Oxford's longstanding housing problem and to inject more economic growth through setting aside land for science based industry at the Northern Gateway. The latter proposal was found to have severe problems at the Examination; not least access from the A34, and local pressure on schooling should there be housing. The Green Party also considers that more jobs would lead to more pressure on housing and more commuting.

The City Council attempt in their paper to you, Stephen J Pratt, to suggest that the removal of the South of Oxford Strategic Development Area does not have any major implications on the Core Strategy. In our view, however, the removal has major implications on Oxford that require close scrutiny and detracts from an already flat looking strategy. The main effects are considered below:-

1. The removal of SOSDA does little to improve the housing/employment balance which emerged as a major shortcoming of the Core Strategy at the Examination.
2. The proposed regeneration of Blackbird Leys and expansion of Cowley Centre shopping is likely to be severely impeded without this new development.
3. It was very evident at the Examination that many existing areas of Oxford are beginning to suffer from the pressure of squeezing in more housing and the Council's statement does not deny that this will not happen. It is a major concern of the Green party that vigorous and sustainable urban communities are the result of any Core Strategy, but this likely additional pressure is not considered.
4. In particular the City Council's statement that Summertown can be brought forward from being a contingency site is not realistic given the considerations brought up at the Examination.

### **Housing/Employment Balance**

This was a major concern at the Examination and the Core Strategy was criticised for not sufficiently addressing this. Although the Council in its submission suggests the removal of the proposal for 4,000 homes will not duly affect the balance as calculated before, we are sceptical of this. We consider the balance in favour of homes needs addressing. We would

like more time and information to look at this in more detail. We also seem to recollect at the Examination that material used to justify the Northern Gateway proposal drew on the increased availability of labour due to SOSDA.

### **Regeneration of Blackbird Leys and Expansion of Cowley Centre**

These are major proposals in a Core Strategy which is short on proposals to regenerate large parts the existing built up and ageing City. In our view the City Council have an unrealistic optimism that the removal of SOSDA will not impede this. The Green Party put evidence before the Inspector about how the plan was based on optimistic forecasts of economic growth and ignored public expenditure cuts. It is now clear that the next ten years will see cuts in public spending, probably substantial with regard to housing, transport and most community services. The non implementation of SOSDA resulting in the removal of opportunities to use finance obtainable from Section 102 agreements for improvements to services locally, together with the lessening of projected spending power and public spending cuts, make development and regeneration in the area which was always an optimistic proposal even more problematic.

### **Pressure for Housing Sites within the Existing City**

The City Council say in their submission that they are working proactively with the Homes and Communities Agency to bring forward additional housing sites. They consider many of these would be small and could be considered under the Sites Allocations DPD. However the Green Party attended every session of the Examination and it was very significant how much public concern there was on the pressures infilling was bringing, its effect on schools, community services, green corridors, biodiversity, leisure space, allotments, loss of garden space. There is particularly a need in the coming period to retain people's opportunity to grow food locally in a world where food security is becoming a major issue.

The impetus to cram in more housing would result in major problems that require overall policies at a strategic level for these to be prevented and to ensure vigorous and sustainable communities. This needs examining and dealing with in a different way than the existing Core Strategy has so far done.

### **Summertown Contingency Site**

There is a suggestion this site can be brought forward. At the Examination this appeared doubtful. The owners of the land were unlikely to be in a position to release it. No sites were put forward for alternative playing fields and the owners were unlikely to relocate from the area. There were other problems like schooling and removing or relocating allotments.

### **Conclusion**

The Green Party consider that the Core Strategy needs to be completely reworked and the removal of a proposal to increase the built-up area adjoining Oxford has highlighted this need. It was also clear following the Examination that there were major obstacles to development at the Northern Gateway and Summertown. What vision the Strategy had is severely diminished and in doubt.

Certainly there should be no move to push the Strategy forward without opportunities for the general public to review the significance of the changes likely to result from the non implementation of SOSDA.

## **OXFORD CITY CORE STRATEGY**

### **REPRESENTATIONS to Inspector Stephen Pratt, for consideration at the Procedural Meeting to be held on 11<sup>th</sup> January 2010**

1. The meeting on 11<sup>th</sup> January should focus on procedural issues; it should not be simply an additional ad hoc hearing in the Examination process, since there have been no material changes of circumstance since the suspension of that process.
2. Inspector Fenton explicitly suspended the Examination process “*until the legal challenges are concluded.*” Those challenges have not yet been concluded, and there have been no material developments that justify any change from the decision of Inspector Fenton. Decisions made by Inspector Fenton prior to his retirement should not be re-examined simply because of his replacement, and could be justified only by material changes in circumstances.
3. The Report completed by Inspector Fenton on the Core Strategy Examination should be published forthwith. This would clarify matters for, and allow transparency for assessment of alterations which may eventually prove necessary.
4. The Core Strategy should be consistent with the final adopted Regional Spatial Strategy (RSS), as emphasised in the Core Documents in the Examination Library. Since no such RSS is extant, it is premature to proceed with the development of the Core Strategy, and in conflict with previously-stated principles.
5. The Consent Order deposited by the ‘defendants’ in the legal challenge to the South East Plan is still currently under consideration by the ‘plaintiffs’. It is not yet certain that the Consent Order will be acceptable to the ‘plaintiffs’ or the court, hence there remains no certainty of the final form of the RSS. It is thus premature to anticipate the final form of the RSS and to proceed with amendment of the Core Strategy on the basis of inconclusive parameters.
6. The City Council has publicly stated its belief that the SOSDA will ultimately be incorporated into the RSS, either by rectification of earlier defective processes, or through direct intervention of the Secretary of State. There is no logic in the City Council proceeding with amendments to the Core Strategy to make it consistent with a South East Plan which the City Council itself does not believe will be adopted. At best, such a course would be wasteful of resources and instrumental in exacerbating confusion.
7. Whatever the final outcome of the legal challenge, finalisation of the South East Plan will necessitate further consultation with all interested parties. Amendment of the Core Strategy should, similarly, involve proper consultation, particularly in view of the deficiencies in earlier consultation. To proceed with the Examination of the Core Strategy when its final form cannot yet be determined, and when the proper processes for its finalisation have yet to be carried out would be illogical, pointless, unconstitutional and undemocratic.
8. Where the adoption of the RSS for the South West region is afflicted with similar delays, it has been concluded that development of several Core Strategies should be delayed; a logical and consistent national approach should be adopted, following established precedent.
9. The Core Strategy has been revised repeatedly previously, to reflect amendments to the RSS required by the Review Panel, and because of the concerns of Inspector Fenton regarding adequacy and soundness. Its development has been convoluted and confusing already for

interested parties, including the general public. To continue the process now, with conclusion still not possible, and further revision near-certain, would only exacerbate confusion.

10. The judgement of whether or not the Examination should proceed should not be based on how much or how little amendment to policies may be required, but on whether the principle is sound, of continuing to meddle with a document which has already been modified repeatedly, cannot yet be finalised and which will certainly need further revision.
11. Revisions to the RSS suggested by the Consent Order currently under consideration in the legal challenge do not relate exclusively to the inclusion of the SOSDA, but also to other issues. Further revisions may also emerge as the court process evolves. It is thus impossible to envisage what amendments may ultimately be determined. It is thus equally impossible to implement any parallel amendments to the policies or text of the Core Strategy, or to suggest categorically that these will be minimal.
12. At the time that the Panel Review of the proposed SE Plan led to the inclusion of the SOSDA, a complete revision of the Core Strategy was implemented, including renewed consultation. It is inconsistent, unsound, and in conflict with the Statement of Community Involvement to now suggest that the removal of the SOSDA from the SE Plan can be reflected by only minor amendments to the text of the existing final submission Core Strategy, without further consultation.
13. It is a requirement that Core Strategies should be properly coordinated with those of adjacent authorities. The removal of the SOSDA from the SE Plan will necessitate very considerable revision to the policies of South Oxfordshire District Council, and the consultations implicit in that process. Oxford City Council has, itself, alluded to the close relationship of the city with communities outside the city boundary, and this makes close cooperation and coordination a critical requirement of its own Core Strategy. Inspector Fenton criticised previous shortcomings in this regard at earlier Examination hearings. It would be irrational to proceed with the Core Strategy development when no such coordination has been carried out, nor is possible, until the uncertainties relating to the RSS are resolved.
14. In view of the likely considerable delay in the completion and adoption of the Core Strategies of the surrounding Local Authorities, and the considerable and continuing uncertainties regarding the final form of the South East Plan, there is simply no sound reason why the Oxford Core Strategy Examination process should be resumed.

Peter Thompson

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Oxford  
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# SOUTHFIELD GOLF CLUB

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Mrs Helen Wilson BA (Hons)  
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4<sup>th</sup> January 2010

Dear Mrs Wilson,

***Oxford Core Strategy 2016 – 2026 Procedural Meeting – Monday 11 January 2010 – Response  
By Southfield Golf Club, Oxford City Golf Club, Oxford Ladies Golf Club & Mr R. J. Davies***

Further to your letter dated 26<sup>th</sup> November 2009 regarding the above, it is noted that the new Inspector has invited participants to submit brief written responses in light of the legal challenges to the South of Oxford Strategic Development Area (“SDA”). The response on behalf of Southfield Golf Club et al, is set out below.

The on-going delay to the Core Strategy is highly regrettable to the Club(s) given the significant amount of time, effort and resources expended by participants in engaging in the Local Development Framework (“LDF”) process to date, including the hearing sessions and associated meetings. The delay does little to establish confidence in the forward planning process or deliver the ‘certainty’ provided by an up to date policy document. The advantages of Spatial Planning, set out in PPS12 paras 2.2 – 2.7, are clear and should not be cast ‘adrift’ by continued indecision and inaction. It is critical that all Core Strategies, including that for Oxford, are produced in a timely and efficient manner.

It is understood from the Government Office for the South East that the legal challenges to the South East Plan relating to Oxford will not be contested by the Secretary of State. Therefore, a response from the Courts is awaited confirming the decision and associated legal remedy. In the short term, the South of Oxford SDA cannot be relied upon with sufficient certainty. Thus, reference to it in the Core Strategy should be omitted by the Inspector.

The most expeditious way forward would be for the new Inspector to complete the Examination stage of the LDF process by focussing on those matters and development proposals not affected by the SDA legal challenge. His report can make clear that the omitted sections of the plan could be updated and incorporated in an early partial review of the Core Strategy, once the situation with the SDA or its alternative is clarified. The forward planning process is regularly reviewed to maintain an up to date policy framework in any event. Thus, the extent of any delay to the SDA or its alternative could be minimised, easily.

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In a message dated 15/12/2009 11:07:06 GMT Standard Time, [JaneGriffin@seeda.co.uk](mailto:JaneGriffin@seeda.co.uk) writes:

Helen

I have read the Inspectors paper and questions and the City Council's response.

SEEDA has always recognised the difficulties of delivering the South of Oxford SDA but considers that it is needed long term to help resolve the City's housing needs. In terms of Northern Gateway the loss of this site would have a considerable impact on the delivery of jobs in the City and have a significant impact on the continued economic growth of Central Oxfordshire and the Diamond for Investment and Growth. The types of highly skilled jobs attracted to Oxford contribute to the stimulation of the entrepreneurial and innovative economy that makes the Oxfordshire Diamond so successful and at the forefront of the UK's global competitiveness. These are not easily replaced elsewhere.

SEEDA is otherwise in general agreement with the arguments put forward by the City Council.

Kind regards

Jane Griffin

Jane Griffin  
Planning and Infrastructure Manager  
SEEDA

## **South Oxfordshire District Council**

### **Response to additional questions 5.1.2010**

**3/CS6/CR5**

- 1. Whether any progress can be made with the examination of the Oxford Core Strategy, pending resolution of the legal challenge relating to the South of Oxford Strategic Development Area**

SODC agrees with the City Council that the Oxford City Core Strategy examination should progress whilst the legal challenge to the Strategic Development Area (SOSDA) proceeds. The core strategy should proceed on the assumption that the SOSDA is not proceeding and that no decision has been made on whether the 4000 additional houses will remain as an allocation in the Central Oxfordshire area. This council believes that the impacts of the deletion of the SOSDA on the housing/employment balance mean that the allocation of employment land at the Northern Gateway should be reviewed.

- 2. What, if any, are the implications of the legal challenge relating to the South of Oxford Strategic Development Area (SOSDA) for the strategy and policies of the Oxford Core Strategy, in particular:**
  - a. What would be the implications for the Oxford Core Strategy if the SOSDA proposal were to be deleted from the South East Regional Spatial Strategy or did not come forward within the current plan period?**

The South East Plan indicates in paragraph 22.7 that 'Over the whole plan period to 2026 there is a need to ensure that the balance of jobs and houses at both the sub-regional and main settlement level does not worsen and preferably improves', in addition in paragraph 22.9 it indicates that whilst the use of land at Peartree will be a matter for local determination 'Land should not be released for employment to the north of Oxford that could adversely affect the future economic buoyancy of Bicester, Kidlington or Witney...'. The council believes the main implications of the deletion of the SOSDA will be on the balance of housing and employment and this issue needs to be better understood.

- b. What, if any, implications would the deletion or failure of the SOSDA proposal have for the housing/employment balance of the Oxford Core Strategy?**

In relation to the information provided by the city council, a number of issues are not clear, in particular how the figures in the tables have been derived.

The increase in economically active figures appear to have been calculated using the existing economically active figure and adding in the numbers

generated by the proposed 8000 houses. This method disregards the forecast decrease in occupancy rate for the existing housing stock so is likely to result in an overestimate in the number of economically active.

The Oxfordshire Data Observatory (ODO) have published 2008 projections to 2016, these indicate that the economically active in Oxford to 2016 are forecast to be 78,100 (this figure excludes any housing in the SOSDA), that is 9,784 less than the city council's figure for 2016. If the ODO figure is used in the calculations the ratio of jobs to economically active in 2016 will be 1.407 (low growth) and 1.441 (high growth) both scenarios are significantly worse than the 2006 base date.

The number of jobs appears to have been calculated using the forecast increase in B jobs identified through the Employment Land Study and a nominal allocation for non B jobs based on the town centre shopping proposals. If this is the case the number of non B jobs is likely to be a significant underestimate we have been advised through our Employment Land Review consultants that non B jobs will remain a relatively constant percentage of all jobs as service businesses grow alongside population and other business growth.

The potential overestimate in economically active and underestimate of new jobs is likely to result in worse housing/employment balance situation than the city council's figures are predicting. This must have implications for the employment housing mix at the Northern Gateway and the potential rate of delivery. This council would like to see alternative proposals which include more housing for the Northern Gateway development.

Any worsening of the housing/employment balance is likely to result in more out-commuting from South Oxfordshire and the other districts around Oxford, this will lead to further pressure for housing and recruitment difficulties for local companies. There are attractive employment sites South of Oxford at both Harwell and Culham Science Centre, both redevelopments of brown field land. These will provide opportunities for new and existing businesses to locate near Oxford without the need for large amounts of additional employment land in Oxford.

- c. Would any contingency arrangements need to be included in the Oxford Core Strategy to address the likely implications of the deletion of the SOSDA or its failure to come forward within the current plan period, and if so, what would these be likely to be?**

This is covered in point b above, the mix of development at the Northern Gateway and rate of delivery need careful consideration.

**3. What minimum alterations to the wording of the strategy, policies, text and Proposals Map of the Oxford Core Strategy (as amended) would be**

Policy CS6 and the supporting text may need to be altered when the exact mix of housing and employment uses has been decided.

The alterations identified by the city council are agreed, in addition there is further reference in section 8.1 Economy. Word searches should also be carried out on the words urban extension, SDA and Special Development Area to ensure that all references are identified.

- 4 Have any meetings been held with key stakeholders (such as GOSE, South Oxfordshire District Council, developers and landowners etc) about this issue since the close of the hearing sessions; if so, could notes of these meetings be forwarded to me as soon as possible.**

None have been held with South Oxfordshire District Council



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Dear Mrs Wilson

### **OXFORD CITY CORE STRATEGY EXAMINATION**

These representations to the Oxford City Core Strategy Hearing are submitted on behalf of the Thames Valley Police Authority, which is responsible for policing in Oxfordshire, and welcomes the opportunity to comment. These comments supplement, and should be read in conjunction with, representations made at other stages of the LDF process.

Thames Valley Police Authority agrees with the findings of Oxford City Council that the Core Strategy Examination can progress prior to resolution of the legal challenge relating to the South of Oxford Strategic Development Area (SOSDA). If the SOSDA is deleted and additional land needs to be identified to accommodate the 4,000 dwellings, it is unlikely this could be accommodated in Oxford City. The city's boundaries lie close to the built edge of the city to the south. Green Belt prevents outward expansion of the city elsewhere and many areas of land in the Green Belt are affected by other physical and environmental constraints. Representations by Oxford City Council estimate that there is potential for completions over the period 2006-2026 of up to 8,743 dwellings. No evidence has been presented to the hearing to promote alternative additional strategic sites within the city.

Based on the limited capacity of the city to accommodate additional development over the 8,000 dwellings allocated by the South East Plan, it is unlikely that the outcome of the SOSDA legal challenge would alter the direction or level of residential development to be dealt with by the Core Strategy. Therefore, the matters to be considered through the hearing should remain unaffected by the outcome of the SOSDA.

In respect of the case presented by Thames Valley Police to the hearing, this sought to demonstrate that the delivery of communities that are inclusive, healthy and crime-free (PPS1, paragraph 27iii) depends in part on the provision of an effective Police Service. New development creates pressure on existing Police resources resulting in a need for the Police to expand and/or adapt premises or build new ones, and provide new equipment. This applies particularly to neighbourhood facilities, but also for "hidden" functions such as major crime, storage, custody, roads policing, specialist training etc.

Thames Valley Police Authority has sought recognition within the Oxford City Core Strategy as identified recipients of infrastructure funding towards growth-related capital expansion. The Regional Spatial Strategy (Policy CC7) and PPS12 specifically refer to the Police Service as a key infrastructure provider.




Policy CS18 of the Core Strategy should be based upon the regional and national definition of 'infrastructure' to ensure all infrastructure delivery agencies are identified. Circular 05/2005 states that a generic policy should clearly set out the principle of developer contributions to apply to all new development. The outcome of the legal challenge to the SOSDA would not prejudice the amendment to Policy CS18 sought by Thames Valley Police, which would apply to all development in the city and is not site-specific.

The Police Authority has devised a methodology that robustly demonstrates the link between planned growth and increased pressure on policing, and which provides a tariff-based approach to calculating contributions towards infrastructure that is not funded from other sources. In this respect, if additional dwellings are required to be provided within the City, infrastructure requirements can be calculated with ease.

Delay in the progression of the Core Strategy could lead to delay in recognition at a local level of the Police as a legitimate recipient of developer contributions through the planning process. Inevitably as additional growth generates additional pressure on the Police service, funds need to be secured to provide a level of infrastructure commensurate with that growth, otherwise the Police Service would suffer and key planning objectives at the national and local level would not be met. It is not possible for these policy provisions, which form the basis for delivery of development, to be dealt with through an alternative means such as Supplementary Planning Documents in the interim.

It is important for the Inspector to continue the Oxford City Council Core Strategy Hearing to ensure an appropriate mechanism is in place for the funding and provision of key infrastructure necessary for the delivery of new development as soon as possible. Any delay in the progression of the Core Strategy will lead to a greater shortfall in capacity of existing Police infrastructure as development continues in absence of revised policy.

Yours sincerely  
For RPS



**VICTORIA TROTMAN BA (HONS) MTP MRTPI  
SENIOR PLANNER**

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**Turnberry**Consulting

4<sup>th</sup> January 2010

**Our ref** L Wilson 04.01.10 OXU-LDF  
**Your ref**

Dear Ms Wilson

**Oxford Local Development Framework - Core Strategy Examination  
University of Oxford**

We are writing on behalf of the University of Oxford regarding the suspension of the Examination into the Oxford City Core Strategy pending a conclusion to the legal challenges to the South East England Regional Spatial Strategy.

As the Inspector will be aware, the University is one of the parties that have challenged the South East Plan's identification of the South Oxford Strategic Development Area. The grounds of the University challenge included the failure of the Sustainability Appraisal to consider reasonable alternatives to a selective review of Green Belt boundaries south of Oxford.

The University has long maintained that a comprehensive review of Oxford's Green Belt boundaries to both the north and south of Oxford should be undertaken at the local level and has submitted representations to this effect throughout the preparation of the South East Plan.

It has been widely reported that the Secretary of State has agreed to submit to judgement in relation to a number of the policies relevant to Central Oxfordshire in the South East Plan. The University has been provided with a draft consent Order upon which the University will shortly be responding to the Treasury Solicitor. It appears likely that the Consent Order will be finalised in the first part of January and we anticipate that it will set out the extent and nature of the policies to be amended. We anticipate that following conclusion of the Consent Order the Secretary of State will identify the process he intends to follow from this point forwards for the re-determination of the relevant parts of the Plan. Given this position we feel that it would be appropriate for serious consideration to be given to the merits of proceeding with the Core Strategy Examination prior to a clear understanding of the process for repairing

the South East Plan. Our concern is that if the Examination does proceed resources will be wasted upon a procedure which will be affected by the outcome of the redetermination process. It is only when that process has been concluded that the issue of the Green Belt review will be resolved. In that context, it may be thought appropriate to defer the meeting on 11<sup>th</sup> January to enable further consideration to be given to these issues and for the meeting to take place after completion of the Consent Order.

There are various reasons why the South East Plan redetermination process has implications for the Oxford Core Strategy including:

1. Whilst the South East Plan policies for a SDA south of Oxford will be quashed, there will still be a need in the South East Plan to accommodate the housing numbers for the Central Oxfordshire region.
2. Any policy review needs to consider all the options for accommodating such housing in Central Oxford, this could – if properly considered – include an increase in housing numbers within OCC. The area within which the housing will be accommodated will be addressed through the redetermination of the relevant South East Plan policies.
3. The approach of OCC should be to ensure that the Core Strategy is sound, having full regard to the potential outcomes of the SEP.

On the basis of the points made above, we request that the Inspector defers the 11<sup>th</sup> January meeting until the Consent Order has been finalised and then reconvenes the meeting having received further representations based on the final Consent Order.

Yours sincerely

A black rectangular redaction box covering the signature of M P Roberts.

**M P Roberts**

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**Turnberry**Consulting

8<sup>th</sup> January 2010

**Our ref** L Wilson 08.01.10 OXU-LDF  
**Your ref**

Dear Ms Wilson

**University of Oxford  
Oxford Core Strategy and the South East Plan**

I refer to my letter of 4<sup>th</sup> January 2010 regarding the Core Strategy. I note that the Inspector has determined to proceed with the meeting. To assist the Inspector we have requested that the Treasury Solicitor write to the Inspector to inform him of the progress of the legal process related to the South East Plan. It is not appropriate for the University, who has received the draft Consent Order on a confidential basis as one of a number of parties, to provide the information in isolation. I am not able to say at this point whether the Treasury Solicitor will accede to our request.

In any event, it would be inappropriate for the University to attend the meeting on Monday as the University has nothing to add to my letter of 4<sup>th</sup> January 2010 and, whether or not the Treasury Solicitor writes to the Inspector, the University could not comment further on the terms of the draft Consent Order.

Yours sincerely

  
M P Roberts

## **Vale of White Horse District Council Response to Issues Raised by Deletion of South Oxford Strategic Development Area**

### **1. Whether any progress can be made with the examination of the Oxford Core Strategy, pending resolution of the legal challenge relating to the South of Oxford Strategic Development Area**

The Vale of White Horse District Council agrees with the City Council that the Oxford City Core Strategy examination can progress alongside the legal challenge to the South Oxford Strategic Development Area (SOSDA). The examination should proceed on the basis that the SOSDA is not proceeding and that no decision has been made as to whether the 4000 additional houses will remain as an allocation for Central Oxfordshire. The examination should focus on the impacts of the deletion of the SOSDA on the housing/employment balance and the allocation of employment land at the Northern Gateway.

### **2. What, if any, are the implications of the legal challenge relating to the South of Oxford Strategic Development Area (SOSDA) for the strategy and policies of the Oxford Core Strategy, in particular:**

#### **a. What would be the implications for the Oxford Core Strategy if the SOSDA proposal were to be deleted from the South East Regional Spatial Strategy or did not come forward within the current plan period?**

As stated in the South East Plan at para 22.7 “Over the whole plan period to 2026 there is a need to ensure that the balance of jobs and houses at both the sub-regional and main settlement level does not worsen and preferably improves”. This is recognised in the Core Strategy at section 3.4 where it states that “the core strategy seeks to achieve a broad balance between housing and employment growth”. It is then stated that the SOSDA was included partly to address the housing jobs imbalance. Without the inclusion of the SOSDA it is therefore inevitable that the recognised housing jobs imbalance will not improve. Therefore without a reduction in employment allocations to reflect the reduction in housing the core strategy will not meet one of its strategic objectives of “ensuring an appropriate balance of housing and employment growth”. The allocation of employment land at the Northern Gateway therefore needs to be reconsidered in light of the change in circumstances and may need to be refocused.

#### **b. What, if any, implications would the deletion or failure of the SOSDA proposal have for the housing/employment balance of the Oxford Core Strategy?**

As stated above the loss of the SOSDA would mean that the expected improvement in the jobs housing imbalance would not take place. The city council has produced figures to address this point but there are some issues with the information.

The calculation of the economically active uses the current levels of economically active. However the level of economic activity in most populations is declining as they become generally more aged. Without an adjustment for this effect the economically active figures are misleading.

Also, recent forecasts by the Oxfordshire Data Observatory (ODO) have indicated a reduction in the expected levels of economically active in comparison to previous forecasts. ODO projections to 2016 published in 2008 show the economically active in Oxford at 2016 as 78,100 when the city council's figure is 9,784 higher. This discrepancy needs to be explained as a reduction in the expected levels of economically active will adversely affect the jobs housing balance in line with this council's expectations.

Further, the jobs total appears to have been calculated using the Employment Land Study. This study is now of considerable vintage and given the effects of the recession it is not likely to be a reliable basis for forecasting.

The effect of these factors is likely to mean that the jobs housing balance will not improve and may actually worsen. This would mean the core strategy would not accord with its strategic objectives and would not reflect the views of the panel for the South East Plan. To address this issue the Northern Gateway could be refocused to deliver more housing but the core strategy indicates that the area is unsuitable for significant amounts of housing.

Also there is already recognition in the core strategy in section 1.1 that Oxford has a high level of in-commuting with about half its workforce living outside the city. Without the SOSDA the development of the Northern gateway is likely to leave this situation unchanged and potentially could increase the level of in-commuting. This would act against the core strategy's strategic objectives relating to climate change and car usage.

- c. Would any contingency arrangements need to be included in the Oxford Core Strategy to address the likely implications of the deletion of the SOSDA or its failure to come forward within the current plan period, and if so, what would these be likely to be?**

As above this should involve the reconsideration of the levels of housing and employment at the Northern Gateway.

- 3. What minimum alterations to the wording of the strategy, policies, text and Proposals Map of the Oxford Core Strategy (as amended) would be necessary to take account of the possible deletion of the South of Oxford Strategic Development Area proposal or its failure to come forward within the current plan period?**

To accord with the suggested contingency above the wording of policy CO6 and its supporting text would need to be reconsidered.

The alterations to the text proposed by the city council are supported. Other minor changes may be required elsewhere in the document.

- 4 Have any meetings been held with key stakeholders (such as GOSE, South Oxfordshire District Council, developers and landowners etc) about this issue since the close of the hearing sessions; if so, could notes of these meetings be forwarded to me as soon as possible.**

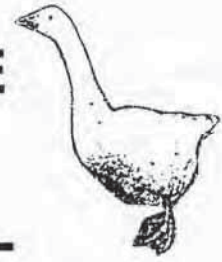
No meetings have been held involving the Vale of White Horse District Council



# WOLVERCOTE COMMONERS COMMITTEE

Secretary: Andrew Burchardt

Wolvercote, Oxford,



Wolvercote Commoners' Committee Statement for procedural hearing 11<sup>th</sup> January 2010.

There is no sound reason why the Strategy Examination process should be resumed.

The examination process was suspended “until legal challenges are concluded”, which they are not, and there are no reasons why this should now be changed by a new Inspector. There is an established precedent where the South West Region's Core Strategies have been similarly delayed on legal grounds. Examination at this stage would add to confusion, with ever changing proposals and should only continue if the proposals were thought by Inspector Fenton to be sound. We therefore believe that Inspector Fenton's report should, for transparency, now be made public.

We **do** believe that any amendment to the Core Strategy would be undemocratic without proper consultation, particularly as previous consultation fell far short.

We **do not** believe there has been any material change

We **do not** believe this is correct procedure. - What are the cost implications?

We object to the use of Safeguarded Land before other areas across the City are fully developed – The 2001-2016 Local Plan para. 4.2 refers to the Green Belt and states that “Planning Permission will only be granted for the following developments: a. agriculture and forestry; b. essential facilities for outdoor recreation and similar uses provided the built element, including floodlighting and car parking is limited; c. limited extension, alteration or replacement of existing dwellings; d. limited infilling”. The same report refers to Safeguarded Land as being land between a built up area and the inner edge of the Green Belt.

Further to the above we wish to add the following points.

### **3.1 Access and Highways:**

We are aware of the County's Local Traffic Plan currently under consideration, however, the Council have proposed **no** mitigating measures to address serious concerns raised at the September Hearing regarding adding to the current congestion. The 2007 Council Preferred Options Document notes considerable congestion at Peartree and that highways and transport issues would need to be resolved before any development could take place.

### **3.2 Residential Amenity:**

Based on recent communications, the City Council appears to be proposing a change of definition regarding the housing/employment mix at the site. We concur with the 2007

Preferred Options Document which notes high background noise from the A40 and concludes that "segregation of the site from the rest of Oxford means it is not appropriate for residential development" The report concludes that the area was unlikely to be sustainable unless significant transport measures were implemented. We are strongly opposed to building on green belt land and consider it unwise to build on land known to have a seasonally high water table. Such action could result in increased flood risk for new residents and those in surrounding areas.

### **3.3 Natural Habitat:**

Wolvercote conservation area extends into the proposed development area. We feel this conservation area should be enhanced rather than destroyed – the Saxon hedge which runs alongside the development is irreplaceable.

### **3.4. Air Quality:**

At the September Hearing it was noted that Wolvercote Roundabout already has one of the highest air pollution rates in the city and we are disturbed to learn that the potential increase in traffic would worsen the situation.

### **3.5 Other Considerations:**

There is a general shortage in the area of land suitable for winter grazing. It is good management to remove animals from an SSSI during winter months (e.g. from the adjacent common lands) and an area of the proposed development site could be put to good use for this purpose.

There were concerns noted by Inspector Fenton regarding the failure to meet a requirement that the Core Strategy should be properly co-ordinated with those of adjacent local and county authorities. These concerns **MUST** be addressed.

Other concerns such as infrastructure and schools remain, along with other nearby developments such as the proposed Wolvercote Mill Site.

We also question whether the moving of Emergency Services to this site would be advantageous and have seen no evidence that these service providers consider it to be so.

### **4.0 Phasing**

The City's response shows that proposals appear to be changing, with Safeguarded Land being developed first. We remain opposed to development of any Safeguarded Land until **ALL** other options have been exhausted within the city, the county and the region as a whole.

In conclusion, we re-iterate that there is no sound reason why the Strategy Examination process should be resumed until the legal process is complete. Furthermore it is imperative that if the planning process is resumed, a thorough and proper consultation is included.

We hereby submit our statement, which was endorsed in principle at a Public meeting held on 16<sup>th</sup> December 2009.

