

From: Beccy Micklem [REDACTED]
Sent: 12 March 2010 15:52
To: Progofficer@aol.com
Cc: ROCHE Adrian
Subject: Re: Oxford Core Strategy - Final Response
Dear Ms Wilson,

In relation to your request for comments on the suggested process and timetable for completion of the examination of the Oxford Core Strategy, I wish to highlight that I believe there will be a need to include a review of the Habitats Regulations Assessment of the Core Strategy. This is in light of the fact that it is suggested in the Council's response to the Inspector that the Northern Gateway site should include 200 dwellings.

The current version of the Habitats Regulations Assessment states that 'Peartree is being considered for employment-led uses. As such it should not significantly affect recreational use of Oxford Meadows SAC.'
I therefore suggest that this section of the Habitats Regulations Assessment will need to be reviewed, and that this will need to be incorporated into the process and timetable for completion of the examination.

I would recommend that the Council liaise with Natural England over this issue.

Yours sincerely,

Rebecca Micklem MIEEM
Conservation Officer
Berks, Bucks & Oxon Wildlife Trust
01865 775476 (extn. 211)
The Lodge, 1 Armstrong Road, Littlemore, OX4 4XT

Join us today: www.bbowt.org.uk

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>>> <Progofficer@aol.com> 08/03/2010 14:34 >>>

The Inspector has asked me to point out that this is not the time for making representations about the detailed changes suggested to the Core Strategy or the nature and scope of the additional evidence to be put forward by the City Council.

There will be full opportunity to make representations on these matters during the proposed consultation period. The purpose of circulating the City Council's latest response to the inspector is to let everyone know about the process and timetable that is being suggested by the City Council for completing the examination of the Core Strategy.

If anyone has any comments to make on the suggested process and timetable, they should be sent in by Friday 12 March 2010.

Regards

Helen

EIP Oxford Core Strategy

Letter from Oxford City Council 3 March 2010 - completion of the Oxford Core Strategy examination

Comments of CPRE Oxford City on the suggested process and timetable to Inspector Stephen J Pratt

General comments

We remain extremely concerned at the apparent pressures from Government and the City Council to expedite the EIP process, when in the circumstances there are strong arguments for a radical re- think of the Core Strategy by the City, rather than attempt to progress a very flawed document - especially as the current Local Plan runs to 2016. The Inspector has already outlined the main issues at the conclusion of the Procedural Meeting in February.

Given the litany of revisions so far, and the additional round of changes now proposed by the City, we seriously question whether the current process retains any real credibility and whether further “tinkering” to the current Core Strategy document is acceptable to the majority of local stakeholders.

We reiterate our view that no Examination hearings should be convened until the SE Plan Consent Order is finally agreed by all parties and issued (this is probably within weeks of being resolved now) and it is also clear that DCLG do not intend to make any other alterations to the published SE Plan. All participants can then understand fully the final SE Plan policies under which the Core Strategy must be considered. Any other course of action would be illogical and unreasonable.

We note the City’s suggested changes to wording, but contend that the issue is far more fundamental than that in terms of requiring a rigorous re-think of the Core Strategy in light of the changed Regional /SubRegional Plan context, the changed national economic context, and the issues surrounding the problematic Housing/ Jobs “balance”. If 4,000 out of 12,000 houses for the City are now deleted, we contend this must have a radical bearing on a range of policies.

We would also reiterate our request that Inspector Fenton’s findings from the adjourned EIP are published as soon as is practicable – in some shape or form - so that all participants can fully understand the context for any views the new Inspector may have on the Core Strategy.

Specific comments (following order of City letter)

We note that the City now wish to proceed on basis of:

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

We gather that, in addition to changes to wording of the Core Strategy previously proposed by the City Council, there are now to be detailed associated changes to other documents, and that the City proposes that the schedule of further changes (incorporating the deletion of

references to SOSDA and changes relating to housing/employment balance and the Northern Gateway mentioned above) will be published and subject to a full public consultation.

This recognition of some of the implications of deletion of SOSDA is to be welcomed, but this new round of full public consultation must afford stakeholders the opportunity to comment afresh on a number of issues in the Core Strategy where they feel the deletion of SOSDA creates a new context. The problem here is that it may well open up many issues considered by the first Inspector and it will be difficult (and we would argue unreasonable) for the Inspector to try to keep a lid on this Pandora’s box of issues. We have always seen this as one of the consequences of the deletion of SOSDA.

We would also contend that it would be foolhardy for the City to publish a schedule of further changes until the SE Plan Consent Order is finally agreed by all parties and issued and there is a definitive policy on SOSDA.

This brings us to the suggested City programme. We note that the City are implying it is very optimistic. We would comment as follows:

By 12 th March	Inspector’s response received
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As comments are only requested from participants by 12 March, we assume the Inspector will require at least a week to read and digest these comments and guide the City on the form and nature of those proposed changes - especially as they are vital in forming the basis of a “sound” Core Strategy. So 12 March is not feasible for Inspector’s response.

By 2 nd April	Subject to Inspector’s response, Council to prepare further changes
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We assume this is a crucial stage for the City to get all the draft changes absolutely right in light of the Inspector’s advice before publishing – in effect this is their big opportunity to formulate a “sound” Core Strategy - and two weeks seems very optimistic. One would have thought taking some time at this point would be very important.

9 th April	Consultation begins
21 st May	Consultation closes (6 weeks later)

We note the comment about the public consultation period, namely “internal legal advice that we can proceed with further consultation during the period leading up to and including local elections, and potentially a General Election”. We are sure they *can* – but the issue here is that it is surely not sensible or reasonable to hold important public consultations during a major election period – not least on local politicians. We still do not know whether the General Election will be on 6 May or as late as 3 June. And if control of the City Council shifted in May, would this affect the City’s proposed approach to some degree - so we all get dragged through this process again. This is not a public consultation over a pedestrian crossing – this is the future planning of one of England’s ancient cities.

The remainder of the programme then needs to be geared to the Consultation period.

We trust these comments are helpful in producing a credible and robust Core Strategy that local stakeholders can support.

for CPRE Oxford City
9 March 2010

From: Rostar [REDACTED]
Sent: 12 March 2010 12:25
To: progofficer@aol.com
Subject: Comments to Inspector Pratt from ENGAGE Oxford
Dear Inspector Pratt

Engage Oxford is disappointed by the recent response of Oxford City Council to your questions. They have not addressed any of the substantive points you raised at the recent procedural hearing and their proposed timetable allows no opportunity to address them. For example, the need to identify alternative strategic sites for housing in the Oxfordshire sub-region for 4,000 homes is almost completely ignored.

There are major legal and procedural risks involved in proceeding with the Core Strategy Examination whilst the final outcome of the legal challenges to the RSS remain uncertain. However, despite clear prompting at the Procedural Hearing on 9th February, Oxford City Council do not seem to have even considered such risks, nor taken any legal advice on it. There is no urgent need for the Core Strategy as the current Local Plan remains a valid statement of policy for the next 6 years. We therefore believe that there is a strong argument against taking any risks by proceeding with the Core Strategy Examination.

We refer to our most recent statement submitted to the Procedural Hearing which remains relevant. The only change since then is the even greater delay since this second suspension of the examination. This has led to more uncertainty, more confusion over the plethora of changed documents which has made the Core Strategy a very different plan to that which was originally submitted.

We do not believe that Oxford City Council have made a convincing case for the resumption of hearings and therefore our wish would be that the examination be suspended indefinitely or the whole Core Strategy found unsound.

Regards

Rosemary Harris
On behalf of ENGAGE Oxford

From: [REDACTED]
Sent: 11 March 2010 21:11
To: Progofficer@aol.com
Subject: Re: Oxford Core Strategy - Final Response

Thanks helen; just to clarify; the proposed consultation which precedes the hearings would take place in the election period ; we would object to that.

Kind regards,

Sietske

----- Progofficer@aol.com wrote:

>

> The City Council's suggested programme envisages the hearings
> resuming in mid-July 2010, which will be after the local and national
> elections. The inspector hopes to make his decision on whether to
> proceed within the next few weeks.

>

> Regards

>

> Helen

>

> In a message dated 09/03/2010 07:28:02 GMT Standard Time,

> [REDACTED] writes:

>

> Dear Helen,

>

> Many thanks; Friends of Warneford Meadow would like to comment as follows:

> If the inspector is minded to resume the hearings we would like these
> to be conducted after the national and local elections have been held.

>

> Can you please let me know when we can expect Inspector Pratts
> decision about whether or not the inquiry should go ahead?

>

> Many thanks,

>

> Sietske Boeles

>

> Friends of Warneford Meadow

> ----- Progofficer@aol.com wrote:

> >

> > The Inspector has asked me to point out that this is not the time for
> > making representations about the detailed changes suggested to the Core
> > Strategy or the nature and scope of the additional evidence to be
> > put

> > forward by

> > the City Council.

> >

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>> If anyone has any comments to make on the suggested process and
> timetable,
>> they should be sent in by Friday 12 March 2010.
>>
>> Regards
>>
>> Helen
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>

From: [REDACTED]
Sent: 12 March 2010 11:12
To: Progofficer@aol.com
Subject: Re: Oxford Core Strategy: response from RAs

Dear Helen,

Thank you for giving me, on behalf of the Headington and St Clements Residents' Associations, the opportunity to respond to the letter by Oxford City Council.

It is clear from the judicial challenges and possible outcomes, that there have been material changes to the basis on which the present core strategy has been constructed. These are recognised by Oxford City Council in their letter.

A key aspect of a sound Core Strategy is that the material basis on which it has been put forward has been subject to consultation, so that the residents of Oxford have had the opportunity to comment and that their views have in some way been taken into account. Not only was this central requirement not met in full at the Core Strategy Examination, where policies were being put forward on an ad hoc manner, without any consultation, by interested organisations, for example Oxford Brookes University and the Northern Gateway Consortium, it is now additionally not met as a result of material changes that should be taken to consultation. The need for proper and adequate consultation is not even recognised by Oxford City Council in its response.

Thus, the correct sequence to ensure that the Core Strategy adopted is sound, is that the matter has next to be taken to consultation to enable ordinary residents of Oxford, not just parties with vested economic interests, to have their views represented.

Regards

K D Patterson

--- On Fri, 5/3/10, Progofficer@aol.com <Progofficer@aol.com> wrote:

> From: Progofficer@aol.com <Progofficer@aol.com>
> Subject: Oxford Core Strategy
> To: [REDACTED]
> Date: Friday, 5 March, 2010, 9:47
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>

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>
> Further to the recent Procedural
> Meeting concerning the
> examination of the Oxford Core Strategy, the City Council has now
> finalised its response to the Inspector.
> The attached letter sets out the nature and scope of the suggested
> changes to the Core Strategy and associated supporting material, along
> with a suggested timetable for completing the examination.
>
> If you have any comments on this letter, please send them to me no
> later than midday on Friday 12 March 2010.
>
> The Inspector will then make a decision on whether further progress
> can be made in completing the examination of the Oxford Core Strategy.
>
> Regards
>
> Helen
>
>

Our ref- 3/2/457

Your ref-

Anthony Powell
Highways Agency
Floor 1B
Federated House
Dorking
RH4 1SZ

05th March 2010

Mr SJ Pratt BA (Hons) MRTPI
c/o Mrs H Wilson
32 Pennyford Close
Brockhill
Redditch
Worcestershire
B97 6TW

Dear Mr Pratt,

Re: Oxford Core Strategy- suspension and potential re-opening of EIP proceedings; Highways Agency's response to Oxford City Council's additional representations.

Thank you for your letter of the 3rd March 2010 inviting the Highways Agency (HA) to comment on the letter relating to the above. You are already in possession of the Highways Agency's response, in respect of the procedural meeting and we have no further comment to make at this stage save the following;

If the Inspector is minded to proceed with the EIP, the HA wish to reassert its view in Paragraph 11 of its letter dated 16th October 2008 which states;

*'the proposed site is on the outskirts of the city, adjacent to the SRN which will not reduce the need to travel, especially by car and as such is unsustainable and **contrary to the objectives of Planning Policy Guidance 13: Transport***

Paragraph 20 of PPG 13 states;

'local authorities should 1. focus land uses which are major generators of travel demand in city, town and district centres and near to major public transport interchanges. City town and district centres should generally be preferred over out of centre transport interchanges. Out of town interchanges should not be the focus for land uses which are major generators of travel demand'

Furthermore, if the Inspector includes Northern Gateway in Oxford City Council's Core Strategy, then the HA wishes to draw his attention to Paragraphs 7 & 8 of the letter dated 15th May 2009 which state respectively;

'Planning permission will only be granted upon the completion of improvement works, agreed with and secured by Oxfordshire County Council and the Highways Agency, designed to mitigate the impact to the local and strategic road network'

'Planning permission for new development will only be granted if it is supported by infrastructure at a timely stage. Developer contributions will...etc';

Thank you for the opportunity to comment and the HA look forward to being included in any future consultations or proceedings should they arise.

Please do not hesitate to contact me to if you wish to discuss anything further.

Yours Sincerely

Anthony Powell
Network Planning Manager (SE)
Email: 

From: Councillor GODDARD John [INet]
Sent: 11 March 2010 13:08
To: Progofficer@aol.com
Subject: Re: Oxford Core Strategy

On 5 Mar 2010, at 10:14, Progofficer@aol.com wrote:

<ResponsetoInspector030310FINAL.doc>

Thank you for sending me the city council's response to the questions posed by Mr Pratt at the Procedural Meeting on 9 February. The city council's response makes no new proposals of substance.

The impact of the possible deletion of SOSDA has already been considered at earlier meetings and a further hearing will only require repetition of previously stated positions. Equally, further consultation on the jobs/housing ratio will add nothing to the sum of responses already available to the Inspectorate.

As to implications for the Northern Gateway, my previous statements (one to Mr Fenton and one for Mr Pratt's Procedural meeting) have set out my comments on this key issue. My previous objections to the Northern Gateway remain. I would only add that it is not reasonable for the city council to set the number of dwellings at 200 before there has been any consultation on this number and to suggest that any further increase "could be explored at the Area Action Plan stage. This seems to assume that 200 as a minimum will be in the AAP: the proper position is that there is no decision on the existence of the Northern Gateway at present. Accordingly no assumptions should be made on minimum numbers to be revised only upwards in the AAP process.

Possible phasing of the Northern Gateway was raised at Mr Fenton's last hearing. A further hearing on this topic will, again, require repetition of previously given evidence and opinion to no useful purpose.

As to going ahead without any resolution of the location of the 4000 homes previously allocated to SOSDA, again, the arguments against this course, based on the uncertainties and unknown implications, have been expounded already before the Inspectorate by me and many others. It cannot be "sound" to proceed with such large gaps with such wide repercussions.

As to a possible policy review to accommodate the 4000 homes in Central Oxfordshire and possible need to review the Green Belt around Oxford, these, I have previously argued, are the requirements for a sound set of LDFs for the Districts that make up the county. The city council may be right to claim that these issues cannot be anticipated at present; but the correct conclusion to draw from this assertion is that the Core Strategy cannot usefully be progressed until these issues are resolved. It is illogical and operationally dangerous to proceed with such large and repercussive holes in a Core Strategy.

One major omission from the city council's response is yet again in the traffic implications of the possible decisions on housing and jobs. The city council goes into elaborate detail on the ratios between jobs and homes but has yet to recognise that the implications for the quality of life of the people living in the city and in the travel to work area are substantially affected by the location of jobs, homes and social infrastructure. Reducing the need to travel, reducing traffic noise and pollution, increasing the quality of life: these should be the major concerns of the Core Strategy. Alas, the city council seems to be limited in its aspirations to adjusting in a minimalist and cosmetic way words and ratios in an attempt to salvage a Core Strategy.

John Goddard

City Councillor for Wolvercote ward

County Councillor for Summertown and Wolvercote Division

11 March 2010

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From: Lorna Logan [REDACTED]
Sent: 05 March 2010 13:52
To: robert logan; Progofficer@aol.com
Subject: Re: Oxford Core Strategy

Dear Helen,
My responses are as follows:

With regards to the Northern Gateway no mention is made of any new provision for schooling needs or odf dealing with the likely affect on traffic of the 200 new houses suggested in point 3. There is already a plan by Oxford University Press to build 200 dwellings in Lower Wolvercote. Today I heard that there is considerable distress to parents in Wolvercote who have just heard that their children cannot get places next year in Wolvercote school. It is extremely stupid to propose an increase in population without any provision for educational or any other needs.

I believe the current Northern Gateway plan cannot be allowed to go ahead in this vacuum of joined up ideas for the likely affect on the inhabitants of the area or of the transport system or environs of Oxford. Indeed it seems to me that any development at all of that area, cut off by rail and major roads as it is, is likely to have a negative impact on the traffic and environment and is especially unsuitable for housing..

It seems to me self evident that the Northern gateway Consortium, and the University colleges and other land owners included in it, are the only likely beneficiarys of the Northern gateway scheme. This being the case, the motives of the City Council in supporting the Northern Gateway scheme appear to me to be questionable.

Yours sincerely,
Lorna Logan

----- Original Message -----

From: Progofficer@aol.com

To: [REDACTED]

Sent: Friday, March 05, 2010 10:13 AM

Subject: Oxford Core Strategy

Further to the recent Procedural Meeting concerning the examination of the Oxford Core Strategy, the City Council has now finalised its response to the Inspector.

The attached letter sets out the nature and scope of the suggested changes to the Core Strategy and associated supporting material, along with a suggested timetable for completing the examination.

If you have any comments on this letter, please send them to me no later than midday on Friday 12 March 2010.

The Inspector will then make a decision on whether further progress can be made in completing the examination of the Oxford Core Strategy.

Regards

Helen



11 March 2010

Mrs Helen Wilson
Programme Officer
32 Pennyford Close
Brockhill
Redditch
Worcestershire
B97 6TW

Dear Mrs Wilson

OXFORD CITY COUNCIL RESPONSE TO PROCEDURAL MEETING

Thank you for email of the 5 March, 2010 and the invitation for comments on Oxford City Council's letter dated 3 March, 2010 which detailed their suggested approach to the Core Strategy, associated supporting material and timetable for completing the Examination.

On behalf of the Northern Gateway Consortium, we support the Council on their suggested changes to the Core Strategy and associated programme. It is essential that the City Council conducts a full six-week public consultation exercise on the amendments they are seeking to make to the Proposed Changes to the Submission Core Strategy document.

The Consortium would like to expand on the City Council's response to Issue 3 of their letter in respect of the amount/phasing of B1 development and the amount of residential development proposed at Northern Gateway.

Amount and Phasing of B1 Development

The Consortium would accept a maximum ceiling of 55,000 sq m of Class B1 development at Northern Gateway over the Core Strategy period to 2026 which is at the lower of the range of B1 development as set out in Policy CS6. This maintains the very important economic arguments, which were discussed previously at the Examination, but reduces the amount of B1 floorspace being delivered over the Core Strategy period.

A development of 80,000 sq m of B1 floorspace equates to 4,211 jobs, whereas a development of 55,000 sq m of B1 floorspace equates to 2,895 jobs (using English Partnership's guidance of floorspace densities). Therefore, limiting the amount of B1 floorspace to 55,000 sq m leads to a potential difference of over 1,300 jobs at the Northern Gateway and, as such, would have a reduction on proposed peak hour traffic movements.

The Consortium also proposes that this development comes forward in two phases:

1. A first phase which restricts the occupation to a maximum of 20,000 sq m of B1 development prior to 2016; and,
2. A second phase of the remaining 35,000 sq m B1 development being delivered and enabling occupation over the period 2016-2026.

As proposed earlier, this would provide a maximum of 55,000 sq m of B1 development over the Core Strategy period. The Consortium maintains that development of the residential and other complementary uses would not require phasing.

Residential Development

Policy CS6 of the Core Strategy Proposed Changes Submission document proposes up to 200 residential dwellings at Northern Gateway. The Consortium proposed at the Examination (10/11 September, 2009) that the number of residential dwellings should be increased to 450 - 550. The Consortium maintains this argument and suggests that Policy CS6 is amended to reflect a specific amount of 500 residential dwellings. 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. As such, the development will accord with Government advice in PPS1, PPS3 and PPS4.

If the Inspector accepts Oxford City Council's approach in working towards concluding the Core Strategy Examination, the Consortium contends that any subsequent hearing sessions should focus specifically on the key issues identified by the Inspector and upon which the City Council has responded to in their letter of 3 March 2010, with a view to concluding the Examination in Public as a matter of urgency. Furthermore, we would suggest that the Examination hearings should not reopen any of the issues or matters previously discussed during the July-September, 2009 hearing sessions of the Examination held by the Inspector Mr Fenton.

In conclusion, the Consortium believes that the Core Strategy Examination should proceed and that the Northern Gateway AAP process immediately commence upon adoption of the Core Strategy. The Consortium is willing to discuss the phasing and provision of employment land alongside housing land at Northern Gateway in order to ensure that the housing/jobs balance in Oxford does not worsen and preferably improves as required by the RSS on the South East Plan.

If you have any questions or require clarification, then please do not hesitate to contact me.

Yours sincerely

For and on behalf of the Northern Gateway Consortium



Robin Moxon
Planning and Development Surveyor

Tel: 0118 932 7487

Email: [REDACTED]

Judy Chipchase



Secretary Oxfordshire Green Party



Mr Stephen Pratt(Hons)MRTPI

c/o Mrs H Wilson

32 Pennyford Close

Brockhill

Redditch

Worcestershire

B97 6TW

Dear Mr Pratt

Oxford Core Strategy:Comments on City Council letter of 3rd March

Thank you very much for sending the City Council's finalised response which in the time allowed we in Oxfordshire Green Party obviously cannot comment on in any detail. We have the following general comments to make which in no way should be seen as prejudicing all our previous objections that the Core Strategy is unsound and undeliverable.

Our first overwhelming concern is the whole question of the delay in the progress of the Core Strategy since it was first submitted to the Inspectorate. We note the Inspector's concern expressed at the Procedural Meeting on 9th February on the possibility of legal challenge and that the City might like to consider taking independent legal advice about this. We do not know whether this has been done but the City Council from their details in their letter of 3rd March seem to be prepared to press on with the Strategy.

We think this decision is misguided and may indeed open to legal challenge. We note Guidance¹ that states that up to six months suspension might be acceptable but a period greater than this would not. We are not sure what in strict legal terms would be defined as a suspension but even before the Strategy was suspended in autumn 2009, the Public Hearing had been delayed at the Procedural Meeting on 20th January 2009 until summer due to the Council making changes to the document (and to allow parties to comment). The hearing was then again delayed till the autumn because of inadequate arrangements for the Northern Gateway Hearing session. Furthermore since the Examination was suspended in the autumn of 2009, is not now until July 2010 those hearings are scheduled to start again according to the Council's letter.

We are therefore of the view that the Strategy has not been adequately frontloaded and should have been withdrawn to allow proper procedures to be followed. The City Council argue that this would create a policy vacuum but this is not entirely the case in our view as strategic policies have been put forward in the Oxford Local Plan that was to run until 2016. The City Council also point out in their letter of 3rd March that confusion about the number of changes that have been made has been voiced by some people involved in the Examination. This only too clearly shows how much uncertainty there has been in the Examination process amongst highly motivated participants. The wider public awareness of the changes to the plan and the distance it now has from its original consultation process must be even greater

We would therefore ask you to consider advising the City Council now, as in the Guidance mentioned above, that should the Examination proceed that the Core Strategy might be found to be unsound and it is in no-one's interest if time and money continues to be spent on an Examination heading towards a very clear outcome of unsoundness.

We have comments to make on the City Council's proposals for consultation. We consider it inadequate to limit consultation to those involved in the Examination itself. We think the changes are of a level that requires wider consultation which is a major reason for considering the strategy unsound and starting a new process. It seems odd to us that the original plan was conceived without the 4,000 houses which were added to the built up area later, and then these can then be removed again without these changes being considered to require any significant adjustment to policies in the strategy. To us it suggests that the City Council are at present attempting to operate the planning system and hold on to a strategy that accommodates any changes they wish to make or not make, and is apparently unaffected by matters outside their control, regardless of the wider implications.

We have stated in our earlier submission the matters we think affected by the removal of the Southern Extension (I have re-attached these). We think that if hearings recommence they will need to occur surrounding all of these matters outlined by us and be not limited to

¹ Local Development Framework Examining development Plan Documents Procedure Guidance Aug 2009

those suggested by the Council. We dispute the Council's view in their letter that the Southern Extension removal does not affect the regeneration of Blackbird Leys and Cowley centre and does not merit additional consideration. At the examination hearings last summer we supported the Council's regeneration proposals for Blackbird Leys though there a strong case was made by some objectors that they were not deliverable. We are concerned now about the deliverability of both these proposals given the likely shortfalls in investment via planning agreements and the drop in likely local spending power. The broad land policies and allocations need revisiting in public in our view to ensure deliverable benefit to this area.

Yours sincerely,

Judy Chipchase

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 of 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.

Summertown, Oxford

5th March 2010

Mr S J Pratt BA (Hons) MRTPI
c/o Mrs H Wilson
32 Pennyford Close
Brockhill
Redditch
Worcestershire
B97 6TW

Dear Mr. Pratt

Oxford Core Strategy

I refer to the letter of response submitted by the City Council (dated 3rd March 2010) to yourself following the Procedural Meeting on 9th February. This suggests that the confusion expressed by several participants at that meeting may be mitigated by the listing of the Examination Changes made since July 2009.

Whilst this may be helpful, of course the principal confusion arises from the proliferation of different versions of the Core Strategy itself which have been presented, culminating in the final document submitted to the Examination in Public, itself confusingly named "*Proposed Changes to the Submission Core Strategy*". Combined with the woeful inadequacies of the consultation process, this confusion should, in itself, render the Core Strategy unsound.

The Appendix to the current response of the City Council lists *inter alia* document CD16/60, which contains the proposals of both the City Council and the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust for additional wording to be inserted in Section 3.4 of the "*Proposed Changes to the Submission Core Strategy*" document.

This additional wording (whichever version) does nothing to address any issue other than that of the effects of the proposed development of the Summertown Safeguarded Land on the Oxford Meadows SAC. No attempt has been made to address the many other issues relating to this site, Policy CS9, and the text associated with it.

Most specifically, although the site is included in the document "*Proposed Changes to the Submission Core Strategy*" under the heading "*What is our contingency plan*", there is no specific description, either in the wording to Policy CS9, or in the accompanying text that this site would only be designated for housing development as a contingency in the event that the minimum housing target of 400dpa was not being met, and only if this was as a result of some of the designated primary strategic housing sites unexpectedly not becoming available. Neither in document CD16/60, nor in their most recent response, does the City Council attempt to address this error. In their most recent response, the City Council refer to this site as "*the Summertown contingency site*", but again fail to define explicitly what this designation means, or the precise circumstances in which housing development might be allowed.

In their latest correspondence, the City Council points out that the current (2009) AMR confirms that just over 2000 homes had been built in the first 3 years of the Core Strategy period, compared with the RSS target (which is stated as an absolute number, NOT a minimum), of 400dpa, or 1200 houses in total. The rate of housing delivery is thus confirmed as being already 67% ahead of target, and any justification for the inclusion of housing development on the Summertown Safeguarded Land is thus even further diminished.

Yours sincerely,

Peter Thompson

From: [REDACTED]

Sent: 12 March 2010 11:55

To: progofficer@aol.com

Subject: Comments to Inspector Pratt from Mrs Rosemary Harris

Dear Inspector Pratt

At the procedural hearing you made Oxford City Council aware of the of the high number of critical elements of the Core Strategy which appear to fail the soundness test. The stated reason for suspending the examination has not changed with any evidence produced in the interim. The original Core Strategy submission was fundamentally flawed and this has now been tested during the past 18 months where no amount of amendments, adjustments or revisions have been able to assist in improving its soundness - nor do any of the future proposed changes put forward by the City Council.

The proposed timetable produced by the City Council is thus redundant.

I look forward to your decision shortly.

With best wishes

Rosemary Harris

From: sarah benfield
Sent: 12 March 2010 14:41
To: Progofficer@aol.com
Subject: Re: Oxford Core Strategy - Final Response
Dear Helen,

My only comment is that the timetable the Council have proposed, and especially to continue ongoing projects as swiftly as possible without this plan as strategy, seems inappropriate.

Furthermore the report by Mr Fenton should be made available to the consultees and the councillors (Cllr Young in particular was disappointed), as this information may shed further light to assist comments on the proposed timetable put forward by the Council.

Finally, before any meetings and consultations take place, I feel it important that any further plans should be submitted. I understand there is an **Area Regeneration Plan** currently underway by Savills/Oxford Brookes, funded by the HCA. This, like the Conservation Appraisal of Oxford, all needs to be updated and then a schedule of consultations to be arranged.

It would also seem sensible to wait until the Local Election and General Elections have taken place, as major policy funding could change and this could mean a new strategy will have to be revised, especially when there is a new party.

Kind regards,

Sarah Benfield

From: Sean Feeney [REDACTED]
Sent: 11 March 2010 18:05
To: progofficer@aol.com
Subject: Time to find the Oxford Core Strategy unsound
Dear Ms Wilson

Please forward the enclosed comments to Inspector Pratt.

1. Conformity with the Regional Spatial Strategy (the legally flawed south East Plan)

Inspector Pratt's "[Note of Procedural Meeting](#) (paragraph 7.19), which was held on Tuesday 9 February 2010, and [Oxford City Council full response to the Inspector - 3 March 2010](#) , and [Oxford City Council interim response to Inspector - 19 February 2010](#) all neglect the most important evidence given by SEEPB (South East of England Partnership Board?), which was:


Conformity with the Regional Spatial Strategy (the South East Plan) *must be tested by a hearing.*

This oral testimony confirmed my (and others) written representation that the Examination cannot proceed because conformity with the RSS is fundamentally affected by the multi-party judicial review.


2. Addition to the Core Strategy Library

Please add [Examining Development Plan Documents: Learning from Experience](#)  (2MB) to the Examination library.

3. A question for Inspector Pratt

Inspector Pratt, was the Oxford Core Strategy used as a paradigm of unsoundness that informed the writing of virtually every paragraph of the September 2009 Planning Inspectorate guidance [Examining Development Plan Documents: Learning from Experience](#)  (2MB)? I ask this because virtually every paragraph of this guidance can be cited as an argument that the Oxford Core Strategy is unsound. It is also interesting that it was published in September 2009 the month in which the last Oxford hearing was held.

4. The Oxford Core Strategy is fundamentally unsound and the Examination should be halted now

In my opinion, the September 2009 Planning Inspectorate guidance [Examining Development Plan Documents: Learning from Experience](#)  (2MB) provides yet more overwhelming arguments that the Oxford Core Strategy is fundamentally unsound. I believe the Examination should be halted now. In light of this guidance and my (and other parties) representations, I believe any continuation of this Examination is a waste of my time and Council tax-payers' money. Please end this year-and-a-half Examination now.

Yours sincerely

Sean Feeney
[REDACTED]

SOUTHFIELD GOLF CLUB

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C/O Mrs H Wilson
32 Pennyford Close
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B97 6TW

11th March 2010

Dear Mr Pratt,

Oxford Core Strategy - Response of Southfield Golf Club / Oxford City Golf Club / Oxford Ladies Golf Club / and Mr R J Davies ("The Club")

Thank you for the opportunity to respond to the City Council's letters dated 19th February 2010 and 3rd March 2010, which outline a potential process and timetable to complete the Oxford Core Strategy examination. The Club notes from Mrs Wilson, the Programme Officer, that this is not the time for making representations about the detailed changes suggested to the Core Strategy or the nature and scope of the additional evidence to be put forward by the City Council.

The position of the Club regarding the Core Strategy is set out in our previous consultation responses and Examination In Public ("EIP") statements, including a Statement of Common Ground with the City Council, and thus is not repeated in this response.

As previously indicated in the submissions by the Golf Club to the Procedural Meeting, the Club believes that the Core Strategy should be concluded without further delay. The process suggested by the City Council appears to be a pragmatic way forward to enable the effective consultation on the proposed further changes to the Core Strategy and offers the opportunity for those changes to be debated, scrutinised and tested at EIP hearing sessions, if necessary, and the Inspector's Report completed expeditiously.

The Club note that the City Council has sought internal legal advice regarding the implications of the forthcoming local and General Election on the timing of the further consultation. No doubt you will also seek further advice from the Inspectorate as to whether such consultation should be undertaken during the 'Purdah' period for the forthcoming General Election.

It would also be pragmatic to make provision in the timetable for an exchange of statements prior to the recommencement of the Hearings as participants may wish to respond to the points raised by others. Furthermore, as Inspector, you may wish to identify specific questions to be addressed at the hearing sessions to clarify matters.

It is noted that the above would slightly delay the completion and submission of your report and the final adoption of the Oxford Core Strategy. However, it would enable a much more robust and effective consideration of the latest changes to the Core Strategy, necessitated by the legal challenge to the South East Regional Spatial Strategy ("RSS"), prior to adoption of the Core Strategy.

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It is essential that the Core Strategy is completed, given the time and resources expended by the Council and other stakeholders to date on the Core Strategy, so that the City Council can achieve an up to date planning framework to guide the future development of Oxford.

The importance of retaining Oxford's green spaces within the built up environment must be an integral part of a balanced and sustainable spatial strategy for the City. Therefore, the Club wishes to see the previously agreed Statement of Common Ground with the Council, relating to the land at Southfield Golf Course, incorporated into the final Core Strategy so that the current uncertainties over the Club's future are resolved and future investment decisions can be taken by the Club.

Yours Sincerely,

Ray Davies
Hon Planning Liaison Member OCGC Ctee

For and On Behalf of

Southfield Golf Club
Oxford City Golf Club
Oxford Ladies Golf Club
Mr R J Davies

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Wolvercote Commoners Committee (Email)

Hi Helen, not sure if this is an appropriate response, but I would have some concerns regarding the availability of key people with the proposed timetable taking us into peak holiday time and a pending general election. Also, I note a consultation period of 6 weeks is proposed and I wonder if we could expect more detail regarding the nature of the consultation as it was generally agreed that this was previously far from satisfactory.

Please let me know whether you think this response is useful.

Best wishes

Angie