

Response from Summertown St Margaret's neighbourhood Forum to Examiner

Dear Examiner

Thank you for giving us the opportunity to respond to your comments.

I have pleasure in now responding to all the points you raised in your email of July 31 as follows

1 General: We have tried in various parts of the Plan to distinguish clearly between the Spatial and the Community policies. While we understand that the latter are in fact aspirational, we have worked carefully to link similar policies. Thus we would much prefer to be encouraged to label the policies more clearly (Community or Spatial) and thus to keep similar policies in the same part of the Plan. We have discussed this with members of the Planning department and we know that they understand the distinction as indicated by the Headington (Oxford) Plan. We recognise that there needs to be clearer labelling of the types of policy in addition to the numbering system.

2 Policy HCS1

We have reviewed this policy and intend it to cover only the facilities mentioned. However, we have identified one more that we would wish to include (if possible) which is the Waterways community Centre.

3 Policy HCC1

You are right to focus on Appendix 7 of the Consultation Statement.

However, we feel that your suggestion may weaken the determination to have a centrally placed health centre on a site due to be redeveloped at some point and currently owned by the City Council and the University. The opportunity arises from the current SPD (Diamond Place) which lists a health centre as being a primary use of the site (p11). Our consultation suggests that it is more than desirable and is much desired by the community. We do not wish to undermine this in any way. We understand that this is not a negotiation, but wonder whether "Plans for the Diamond Place development will be opposed if they do not include a health centre, providing and expanding a range of primary care and associated services for the local community." Might be more suitable: it exactly reflects our position.

4 Policy HCC2

Yes. We support this approach.

5 Policy RBC1

This policy follows closely that approved by the Headington Neighbourhood Plan (p32, BRC3). Like Summertown, Headington is a secondary district centre of Oxford and found this to be the only way to have a meaningful influence on the control of retail space. We have been encouraged in this approach by the Planning department of the City Council in our discussions with them. We would argue that it is important to retain a policy of this nature. However it is intended as a Community Policy (not \ spatial land use policy) and we feel should be more clearly identified as such.

6 Policy HOS3

The numbering is incorrect; there is no HOS3. We recognise the need to renumber subsequent policies.

7 Policy HOS6

- a) We originally had the character assessments in the main text and removed them for ease of reading. We still think that inclusion might make reading more difficult but will obviously accept your ruling on that.
- b) We were unsure about your reference to NPPF paras 56-61. Did you mean NPPF (July 2018) pages 55-57? If we are talking about heritage assets, we feel that pulling these out of the various character assessments and putting them into a single list may help.
- c) We attach a single list of heritage assets which make a significant contribution to the character of each neighbourhood as per NPPF para 124, 125 & 130. Would it be better to include this as an appendix or a part of the character assessments?

8 Policy HOC3

The Forum did not consider any environmental or amenity criteria for this other than the need for additional housing in the NPA. As this is a Community Policy it is more of an endorsement of a potential activity, rather than a policy which affects development per se.

9 Policy ENS1

- a) Table 1 is the element in the light grey box on pp 36/37.
- b) Map 5 should be Appendix 3!
- c) It is to protect these identified spaces (all of which have a degree of protection already and which are included specifically in ENS2) **and** to protect those many smaller green spaces around the neighbourhood.

10 Policy ENS2

Each of the areas listed has groups working to further improve and enhance them. In at least two of them there are proposals to actively enhance the areas concerned as and when resources are available.

11 Policy ENS4

Flooding policies cover a wide area and should ideally be applied to all developments. We understand the point about proportionality though. We therefore think that making this policy mandatory for all development in those areas of high flood risk (according to the County Council's definition) and all significant developments elsewhere would be proportionate.

12 Policy ENC3

This policy is intended as a Community policy and we would wish to make that clearer. These ideas do lie beyond the boundaries of planning control but they are within the area of community action. Thus we feel that it would be unnecessary to reposition elements elsewhere. We think there may be a call for the additional clarification of the sentence "it will resist opportunities to remove trees, especially mature trees" to read "it will resist opportunities to remove trees, especially mature trees by, for example, TPOs."

13 Policy ENC4

This policy is a Community Policy, and as such should be treated as aspirational, and not one related to Planning Control (Spatial Policies). The Forum understood that the planning

system would not be able to deliver these policies, and therefore they were reformulated as Community Policies.

14 Representations made concerning the Plan

We were glad of the opportunity to comment on a number of the consultation comments that have been made. We have focussed in particular on those of the City Council where we have not received a significant measure of support.

A Policy HCS3

OCC says: Not in conformity with strategic Local Plan policy – in particular it conflicts with some allocated sites for potential development in the Sites and Housing Plan e.g. Summer Fields sports grounds, which, with other sites in the area, are being reviewed as part of emerging policies within the Local Plan 2036. However, HCS3 is commended for providing ‘useful advice’ on the type and location of replacement facilities which could be provided outside the area.

Our comment: Summer Fields isn’t in Sites & Housing Plan 2011-26, and although sites are being reviewed for Local Plan 2036, this is still at draft stage. Our policy HCS3 accepts that loss of this facility ‘may be unavoidable’ but that we, quite reasonably, would seek (a) replacement and (b) as close as possible.

Suggested action: We believe our existing policy should stand

B Policy RBS1

OCC says: Not in ‘general conformity’ with strategic local plan policies i.e. the adopted Local Plan, the approach of the Oxford Transport Strategy and Local Transport Plan 4. Potentially inconsistent with emerging findings of the Corridor studies for Banbury and Woodstock Roads and Policy TRS1 (Sustainable transport and travel).

Our comments: one of the problems of being a 3-tier authority – County, District, Parish/Neighbourhood Forum - is that the County are looking at how to get traffic through Oxford, not at how District Centres will be affected. This is also obvious from the Corridor Studies of Woodstock and Banbury Roads which concentrate on (a) cycling provision and (b) traffic throughput, but don’t look at Summertown as a shopping centre which needs support.

The Summertown District Centre’s viability has been reduced by the terminating of the no 17 bus which linked Wolvercote-Cuttleslowe and Jericho through the Summertown shopping centre. It is therefore even more vital to retailers that parking spaces should not be reduced (the two car parks are already full during opening hours).

We need to bear in mind that the Barton Park development is likely to increase the footfall in SDC but this will depend on parking being available. Also breaking news: 1,000,000 houses in the Oxford to Cambridge arc by 2050, will place further strain upon the Local Plan with increased conflict between local needs for shopping centres and arterial routes into city centres.

So – while the Planners rightly say that the NF policy to retain parking is not ‘in general conformity’, current policies do not take the viability and growth of SDC into account.

Suggested action: The Forum should continue to support policy RBS1 as an important part of the neighbourhood plan.

C Policy RBS2

Our comment: After discussing the various comments from especially the OCC and reading your questions to us, we see that we have left the protection of the district centre in the character assessment for the area. WE feel that it would be helpful especially to the planning authority to pull out the key elements of this into a new policy RBS2. WE appreciate that this will not have been consulted upon directly but feel that the material is already within the plan.

Suggested Action: Create a new policy RBS2: the character of Summertown District centre to read

“Summertown District Centre plays an important role in the life of the Neighbourhood and has a great deal of local architectural and design character which the Plan aims to protect and enhance in the following ways:

- (a) Any development proposals on the west side of Banbury Road from Oakthorpe Road to Suffolk House will be required to protect the existing building form and height of the existing parade of retail units
- (b) Any development proposals on both the west and east sides of Banbury Road in the District Centre will be required to protect the existing building line and pavement width
- (c) Development on the east side of Banbury Road from the existing Co-op store to the Twinings Building on Banbury Road will be limited to four storeys in height
- (d) All developments in the District Centre will be required to respect in design, scale, setting and materials the named heritage assets of the Centre”

D Policy HOS1

OCC says: this is not in general conformity with strategic local plan policies (CS23)

Our comments: The existing policy of OCC is now substantially out of date and in any case under review. The most recent research cited in our plan backs up our contention that there is a need in this area for smaller houses and flats rather than the emphasis on 4/5 bedroom large family homes commanding very high prices. (Summertown: Achieving a balanced housing mix, Stephens et al, Brookes, 2016)

Suggested action: That we retain our proposed policy.

E Policy HOS2

OCC says: this is not in general conformity with strategic local plan policies

Our comments: this is central to our thinking for the NPA. However we do see a potential conflict in our proposed policy of social housing and keyworker housing.

Suggested Action: Change the title of HOS2 to read “HOS2 Social Housing”

F Policy HOS5

OCC says: this is not in general conformity with strategic local plan policies

Our comment: An important aim of the Neighbourhood Plan is to protect the stock of existing family housing (C3) which is under pressure for redevelopment in some parts of the neighbourhood. The pressure is not only from the University and its colleges but from the many other schools and colleges that are located in the area.

Suggested action: The new policy be proposed to read “Where there are proposals to redevelop sites of existing C3 units for new student housing, or to use sites which are suitable for C3 housing for student housing, such proposals will be permitted only under the following circumstances:

- (a) If the proposals are located in the Summertown District Centre or along Banbury north of the District Centre, and,
- (b) If the proposals include a mix of development which includes affordable housing”

G Policy HOS7

OCC says: this is not in general conformity with strategic local plan policies

Our comment: this is an important element of retaining the character of local areas with their character assessments. We would prefer this to stay with the force it currently has. If this is not acceptable, we would like it to become a community policy and clearly labelled as such.

Suggested Action: retain policy as is.

H Policy HOS8

OCC says: this is not in general conformity with strategic local plan policies

Our comment: we have drawn our determination to form a policy from NPPF paras 124 -132 which emphasises the need for communities to identify how plans can create harmonious developments in keeping with the character of the area.

Suggested action: we retain our policy.

I Policy ENS6

OCC Comment: Not in ‘general conformity’. National policy requires residential construction to be assessed only through Building Regs, with BREEAM possible for non-residential. ‘Robust evidence’ would be needed to justify a departure from national policy.

Our Comments: The County and the LEP growth Board are on the point of approving a policy for the County which sets targets for carbon reduction in line with our UK Paris commitments. This policy proposes that in order to achieve this, all new buildings should have a fabric efficiency of 30 Kwh/m2 which substantially below current Building regs.

Suggested Action: If this is insufficient evidence of a need for higher emissions standards, we would suggest that the sentence “ii Residential Units...in London” be deleted and iii be reworded somewhat to improve reading.