



The Planning
Inspectorate

Report to Oxford City Council

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Inspectors appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE
OXFORD CORE STRATEGY
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 21 November 2008

Examination hearings held between 14 July – 11 September 2009
and 14-17 September 2010

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Contents

	Page
Non-Technical Summary	4
Preamble	5
 Part one	
1 Introduction and overall conclusions	7
2 Exploratory meeting and the Revised Submission Document	8
3 Legal Requirements	9
4 Justified; Effective and Consistent with National Policy Tests	12
General	12
Responding to climate change	14
Flooding – Policy CS12	14
Green Belt	15
The scale of new housing and employment development and the homes/jobs balance	17
Other housing issues	23
Hierarchy of centres and retailing – Policies CS1 and CS32	29
Transport planning – Policies CS14 and CS15	32
The built environment – Policy CS19	33
The natural environment – Policy CS13	34
The provision of infrastructure	34
STRATEGIC SITES	
West End – Policy CS5	36
Northern Gateway – Policy CS6	37
Barton – Policy CS7	44
South Oxford Strategic Development Area – Policy CS8	46
Land at Summertown – Policy CS9	47
Monitoring	48
5 Overall conclusions	48
 Part two	
Overall Conclusion and Recommendation	63

ABBREVIATIONS USED IN THIS REPORT

AAP	Area Action Plan
ATO	Access to Oxford
CD	Core Document
CS	Core Strategy
DfT	Department of Transport
DC	District Council
DPD	Development Plan Document
dph	Dwellings per hectare
FPC	Further Proposed Changes
FRMP	Flood Risk Management Plan
GOSE	Government Office for the South-East
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LTP	Local Transport Plan
NGC	Northern Gateway Consortium
NOMIS	National Online Manpower Information System (ONS)
NRIA	Natural Resource Impact Analysis
NLP	Nathaniel Lichfield & Partners
OBU	Oxford Brookes University
OCC	Oxfordshire County Council
OELS	Oxford Employment Land Study
ONS	Office for National Statistics
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RSS	Regional Spatial Strategy for the South East of England (May 2009)
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SOSDA	South of Oxford Strategic Development Area
SEA	Strategic Environment Assessment
SEEDA	South East England Development Agency
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
sqm/m ²	Square metres
UoO	University of Oxford

Non-Technical Summary

This report concludes that the Oxford Core Strategy Development Plan Document provides an appropriate basis for the planning of Oxford city over the 20-year period of the plan. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements and ensure that the plan is sound. These can be summarised as follows:

- Incorporate the Council's Proposed Changes (April 2009) (CD1/1) and Further Proposed Changes (April 2010) (CD1/3) into the Core Strategy, except where amended by subsequent changes and the inspectors' recommendations;
- Incorporate the Council's additional Examination Changes resulting from discussions at the September 2010 hearing sessions (CD16/78), except those relating to the revocation of the South-East Plan RSS;
- Remove the general references to small-scale reviews of the Green Belt;
- Provide more updated detail on the homes:jobs balance;
- Revise the policy on student accommodation;
- Strengthen the policy on the built environment;
- Amend Policy CS10 to confirm that all developments should seek to minimise their carbon emissions;
- Amend the text accompanying Policy CS24 relating to density;
- Amend the wording relating to the provision of affordable housing from commercial developments;
- Provide additional details on infrastructure provision, including schools;
- Amend the Policy for the West End, including schools and the need for a flood risk management plan;
- Amend the policy for the Northern Gateway, including securing measures to mitigate impact on the road network and amended text to reflect the views of Natural England, and include an indicative boundary for the subsequent Area Action Plan;
- Amend the policy for Barton, including references to schools and include a defined boundary for the strategic development area shown on the Key Diagram;
- Amend the policy for Summertown, including references to the need to meet the requirements of the Habitat Regulations and Appropriate Assessment, and delete the star marking this strategic area on the Key Diagram;
- Amend Policy CS2 to confirm the position on Safeguarded Land;
- Strengthen the Monitoring section;
- Add page and paragraph numbers.

Most of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. The changes do not alter the thrust of the Council's overall strategy.

Preamble

- i. This report contains our assessment of the Oxford Core Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement PPS12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
- ii. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for our examination is the submitted draft core strategy (November 2008) as amended by the Council’s Proposed Changes (April 2009) [CD1/1], following an Exploratory Meeting held in January 2009.
- iii. Our report deals with the changes that are needed to make the DPD sound and they are identified in bold in the report. Most of these changes have been suggested by the Council and were fully discussed at the hearing sessions; these changes are set out in Appendix A. They include changes and factual updates, which are needed to ensure the plan is up-to-date and sound. We are also content for the Council to make any additional minor changes to correct any spelling errors prior to adoption. The particular changes that we recommend are set out in Appendix B. Most of these changes were suggested by the Council, but were not included in their schedules of changes. None of these changes should materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken. Where the Council has proposed changes that go to soundness, they have been subject to public consultation and we have taken the consultation responses into account in writing this report.
- iv. The examination of the Oxford Core Strategy has been one of the longest running examinations of a Core Strategy in the country.
 - Firstly, following submission of the original Core Strategy to the Secretary of State in November 2008, Inspector Fenton held an Exploratory Meeting in January 2009, which highlighted key elements of potential unsoundness in the plan. This resulted in an amended version of the document, published in April 2009.
 - Secondly, in October 2009, after the hearing sessions had closed, the examination was suspended due to legal challenges to the South of Oxford Strategic Development Area (SOSDA), included in the South-East Plan RSS (RSS). Following a Procedural Meeting held in February 2010, this resulted in a set of Further Proposed Changes in April 2010.
 - Thirdly, the examination had to consider the implications of the Secretary of State’s revocation of the RSS, announced in July 2010. This meant that the examination was in two parts; the first including the hearing sessions during July & September 2009, followed by resumed hearings in September 2010.
 - After closing the second hearing sessions, the Secretary of State’s decision to revoke the RSS was successfully challenged in the High Court, the outcome of which (on 10 November 2010) was to reinstate the RSS as part of the statutory development plan. The views of all

parties were sought on this position and the inspectors have taken account of the representations received.

- A further challenge has been made to the Secretary of State's statement of 10 November 2010 and the accompanying letter from the Chief Planner, along with the Secretary of State's original letter of 27 May 2010. Pending determination of this matter, the existence of the challenge and the basis for it may affect the significance and weight that may be given to the Secretary of State's statements and to the Chief Planner's letter.
- v. The process of the examination was not typical of a straightforward DPD examination. Inspector Fenton was appointed to hold the original examination, but on his retirement in October 2009, Inspector Pratt was appointed to conclude the examination. However, to avoid re-opening the examination from the beginning and ensure that a joint report could be prepared, in May 2010 Inspector Fenton was re-engaged to assist Inspector Pratt in the resumed hearings. This means that the report is in two parts. The first part comprises Inspector Fenton's report following the original hearing sessions. The second part considers the changes that occurred since the closure of the original hearing sessions, particularly the Council's Further Proposed Changes. All parts of this report are endorsed by both inspectors as a joint report.
- vi. Throughout the examination process, and particularly during the second part of the examination, various challenges were made to the procedure and resumption of the hearings. We considered these challenges carefully, but ruled that the hearings should continue and be resumed. We are satisfied that there have been no breaches in the legislative or procedural requirements in our examination of the Core Strategy or in the conduct and holding of the hearings.
- vii. Several hearing sessions were typified by robust debate and strong arguments between the Council and some participants, which sometimes led to heated exchanges between the participants and several rulings by us. This emphasises the need for the Council to consult and fully engage with local organisations, the community and other stakeholders when preparing future DPDs/SPDs. This will ensure that some of the distrust, mis-information, confusion and uncertainty that typified some of the hearing sessions will not be repeated in subsequent DPD examinations. It will also help to ensure that the plans can be supported by the local communities and truly be the "Council's plan", reflecting the new coalition Government's approach to localism.
- viii. Furthermore, reflecting the principles of localism, where we identified shortcomings in the plan resulting in concerns about soundness, we requested the Council to rectify the plan on two occasions during the examination; firstly, after the Exploratory Meeting in January 2009, and secondly, to bring the plan up-to-date following the legal challenges to the RSS in relation to the SOSDA and the later revocation of the RSS. Apart from a very limited number of small, but important, amendments required by us in order to ensure the plan is sound, the final Core Strategy is as endorsed by the Council on 10 September 2010 and agreed by their officers during the hearing sessions of the examination.

Assessment of Soundness

Part one

*This part of our report comprises Inspector Fenton's assessment of the Core Strategy, as originally submitted to the Secretary of State in November 2008 and amended in April 2009 following an Exploratory Meeting held in January 2009. It assesses the soundness of the Core Strategy, including the discussions at the hearing sessions held between July–September 2009, up until the examination was suspended in October 2009 following the legal challenges to the South of Oxford Strategic Development Area (SOSDA) included in the South-East Plan RSS. The report reflects the position at October 2009, when the RSS was still approved and formed part of the statutory development plan. It also reflects the suggested changes discussed and put forward during the earlier hearing sessions. However, it does not reflect the position after October 2009, including the revocation of the RSS, announced in July 2010. The assessment of soundness of the revised Core Strategy after October 2009, including the deletion of the SOSDA and revocation and reinstatement of the RSS, is considered in Part 2 of our report. **Notes in red indicate where the recommendations are amended as a result of later changes.***

1 Introduction and Overall Conclusions

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Core Strategy DPD in terms of the above matters, along with my recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 I am satisfied that the DPD meets the requirements of the Act and Regulations. My role is also to consider the soundness of the submitted Core Strategy in terms of paragraph 4.52 of PPS12; that is whether the DPD is justified, effective and consistent with national policy. In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The changes I have specified in this binding report are made only where there is a clear need to amend the document in the light of the legal requirements and/or the tests of soundness in PPS12. None of these changes should materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes already undertaken.
- 1.4 My report firstly sets the context for the hearing sessions that were held; secondly considers the legal requirements; and then, thirdly deals with the relevant matters and issues considered during the examination in terms of justification, effectiveness and consistency with national policy. My overall conclusion is that the Core Strategy DPD is sound, provided it is changed in the ways specified. The principal changes which are required are, in summary:

- a) The submitted version being superseded by the Revised Submission Document.
- b) The removal of general references to small-scale reviews of the Green Belt, and confirm the position on Safeguarded Land.
- c) The provision of more detail on the homes/jobs balance.
- d) Revisions to the policy on student accommodation and affordable housing from commercial developments.
- e) A strengthening of the policy on the built environment.
- f) Additional detail on infrastructure provision, including schools, including at West End and Barton.
- g) The need for a flood risk management plan in the West End.
- h) Strengthening of the policy for the Northern Gateway, including securing measures to mitigate impact on the road network.
- i) Amend the policy for Summertown, including references to the need to meet the requirements of the Habitat Regulations and Appropriate Assessment.
- j) Strengthening of the Monitoring section.

This report sets out all the detailed changes required to ensure that the plan meets the legal requirements and the three tests of soundness.

2 Exploratory Meeting and the Revised Submission Document

- 2.1 Because of my concerns about the ability of the submitted plan to satisfy me as to its soundness, I convened an Exploratory Meeting to determine the best way forward. My concerns centred on what appeared to be a high degree of deferment of decisions, which should be made at the Core Strategy stage, to subsequent plans/guidance. The Exploratory Meeting was held on 20th January 2009, where the Council indicated that it was in a position to make changes to the plan to reflect my concerns, without fundamentally changing the strategy of the plan.
- 2.2 As a result of that meeting the Council made a considerable number of textual changes to the plan, as set out in its April 2009 Revised Submission Document (CD1/1). This revision was subject to a further 6-week period of consultation. I am satisfied that the changes introduced by the Council do not alter the strategy of the plan, but rather have given the plan greater precision, clarity and direction. Generally, they draw a better line between what should be included within this key spatial strategy document and the details that should be included in the planned follow-up DPDs and SPDs. Without these changes I would have found the plan unsound.
- 2.3 I have conducted the hearing sessions and written my report on the basis that this Revised Submission Document represents the Council's preferred plan and all references to the Core Strategy should be read as relating to the April 2009 version. In writing this report, I have had regard to the representations made both at the submission stage and at the subsequent further consultation stage, following the revisions made by the Council, together with all the other oral and written representations made to me during the period of the examination.
- 2.4 One minor point to make is that the plan has no paragraph numbers, and some copies lack page numbers. To facilitate ease of use, page and paragraph numbers should be added to the adopted version of the plan. I recommend accordingly.

2.5 **In order to make the Core Strategy sound, the following changes be made:**

i) **In accordance with the changes set out in CD1/1, subject to the further changes recommended elsewhere in this report, and**

ii) **The addition of page and paragraph numbers.**

3 **Legal Requirements**

3.1 The Core Strategy DPD is contained within the Council's **Local Development Scheme** (LDS), the updated version (CD7/23) being approved in November 2008. There, the Core Strategy is shown as having a submission date of November 2008, which has been achieved. The Core Strategy achieves the profile set out within the LDS.

3.2 The Council's **Statement of Community Involvement** (SCI) (CD7/24) has been found sound by the Secretary of State and was formally adopted by the Council before the examination hearings took place. Disquiet has been expressed to me that the Council did not carry out sufficient consultations on the plan and that many people, including those who could be affected by development of the large strategic sites, were unaware of the plan and its proposals.

3.3 It is evident from the details given in Appendix 1 to the Council's statement (C/M1/1), that the Council undertook an extensive range of consultation measures during the preparation stages of the plan. This included a public questionnaire sent to every household, questionnaires and leaflets sent to local organisations and public bodies, letters targeted to those who expressed an interest in the plan, workshops, exhibitions, public meetings and leaflets hand-delivered to houses around the strategic locations, reports to the Area Committees at each stage, along with online information and statutory notices.

3.4 It is regrettable that these consultation measures failed at the time to generate a great deal of interest or response from the general public. However, it is evident from the documents submitted by the Council, including the Regulation 30(d) and 30(e) Statements (CDs 2/2 & 3/2) that the Council undertook extensive consultations at various stages in the plan-making process and that in doing so it met the requirements as set out in the Regulations and in its SCI. However, because of the concerns expressed to me by members of the public, I have endeavoured to ensure that all those who have expressed a wish to participate in the hearing sessions have been given that opportunity.

3.5 The Council has chosen to blank out a small part of one of the representations in view of its concerns about comments concerning a particular individual made therein. That is a matter for the judgement of the Council and does not, in my view, breach any of the Regulations requiring the publishing of the representations at submission stage. This particular representation was made post-submission; in any event, I have had sight of the original representation and the matters subject to the Council's action do not, in my opinion, relate materially to the Core Strategy contents or the matters properly before the examination.

- 3.6 An extensive library of Core Documents has been built up prior to and during the hearing sessions. This library includes the Council's Asset Management Plan 2009 (CD7/26) to which I have had regard. Documents have been variously available from the Council and/or on line and I am fully satisfied that reasonable access has been provided to them and has not prejudiced my consideration of the issues I have identified for examination. I am satisfied that adequate consultation has been undertaken in terms of the requirements of the Regulations and the obligations in the SCI.
- 3.7 Alongside the preparation of the DPD the Council carried out a parallel process of **Sustainability Appraisal** (SA) (CD4/1). An Addendum was subsequently prepared (April 2009) to consider the relevant changes to the plan introduced by the Revised Submission Document (CD4/2). I am satisfied that these documents meet the requirements of the SA regulations. They provide a clear audit of the process by which the Council reached its preferred strategy.
- 3.8 The SA must also fulfil the requirements of the European Strategic Environment Assessment (SEA). In response to criticisms that the SA did not meet the requirements of the SEA Regulations in respect of the historic environment, and the view that the SA might not therefore be legally compliant, the Council commissioned an external audit of the SA from sustainability consultants. (Appendix 2, CD16/8) That review concluded, in general terms, that the SA fulfils the SEA Directive with the possible exception of its monitoring requirements.
- 3.9 Oxford, particularly its central area, is undoubtedly an area of exceptional historic quality and international importance and it is somewhat surprising that the SA does not give the historic environment a greater profile. There is no comment on this issue from English Heritage, but it seems to me that coverage of the historic environment is brief. It does not distinguish between the different elements that contribute to the overall quality and importance of the area, with little reference, for example, to archaeology; its coverage of baseline data is limited, with little analysis of physical effects or mitigation measures. Nevertheless, I am not persuaded that the deficiencies discussed at the hearings are so fundamental, individually or cumulatively, as to significantly bring into question the adequacy or legality of the SA, and in turn lead to the Core Strategy being found unsound.
- 3.10 The Core Strategy has to be seen in the context of the portfolio of plans being prepared by the Council as part of its Local Development Framework. The Core Strategy considers broad strategic issues and is not necessarily the place for a great deal of detail. International, national and regional guidance will continue to apply, as do all the Local Plan historic environment policies. One detailed plan, the West End AAP, covering much of the city centre which is likely to undergo most change, has already been adopted. The proposed Development Management DPD will be looking at historic environment issues in greater detail. I share the Council's view that a proportionate approach to the SA is appropriate and, in this context, I conclude that the coverage of the historic environment is adequate for purpose.

- 3.11 In any event, action can be taken to remedy any perceived shortcomings. The issue of the adequacy of monitoring, a deficiency identified by the consultants in their report, can be rectified. I refer to this further later in my report. The Revised Submission Plan gives greater recognition to the City's heritage and the Council has agreed to progress work towards a Heritage Plan, which can give specific and detailed consideration to issues relating to the historic environment, including the development of comprehensive, focused, baseline information on the city's heritage. I comment more fully on this later in my report.
- 3.12 In accordance with the Habitats Directive, the Council undertook a **Habitats Regulations Assessment** (HRA) (CD4/4) which identified that the Core Strategy could have significant impacts upon the Oxford Meadows Special Area of Conservation (SAC). That HRA, therefore, goes on to carry out an Appropriate Assessment of the possible impacts on that area. This Assessment was updated in July 2009 (CD4/5), responding to comments from Natural England. Both Assessments consider in detail impacts relating to air pollution, water quality, the hydrological regime and increased recreational pressure. They both go on to conclude that none of the policies in the Core Strategy are likely to have significant impacts, individually or cumulatively on the SAC. In order to clarify that further, confirmatory work needs to be undertaken at a more detailed planning stage for the Northern Gateway and Summertown strategic areas. I recommend some additional wording for those sections, later.
- 3.13 The Habitats Directive provides a legal requirement to encourage the management of features of importance to wildlife and fauna. Again, the role and context of the Core Strategy has to be borne in mind. Whilst features such as wildlife corridors can be of great importance in this respect, a number of Local Plan policies continue to apply until subsequent plans, DPDs or SPDs, review and develop the approach to be taken.
- 3.14 Subject to my comments in section 4 below, I am satisfied that the DPD has regard to **national policy**.
- 3.15 In its letter dated 15th May 2009 (CD16/6), the South East England Partnership Board has indicated that the revised DPD is in general conformity with the approved **Regional Spatial Strategy** (RSS), the South East Plan, and I am satisfied that this requirement is met.
- 3.16 It is evident from the text of the plan that the DPD has had meaningful regard to the both the emerging **Sustainable Community Strategy** (SCS) for Oxford (CD7/1) and the Oxfordshire 2030 SCS (CD8/1) covering the whole County.
- 3.17 I am satisfied that the DPD complies with the specific requirements of the **2004 Regulations** (as amended) including the requirements in relation to publication of the prescribed documents; availability of them for inspection and local advertisement; notification of DPD bodies and provision of a list of superseded saved policies.
- 3.18 Accordingly, I am satisfied that the legal requirements have all been satisfied.

4 Justified; Effective and Consistent with National Policy

General

- 4.1 At the Issues and Options stage, the plan contained 23 spatial issues. Subsequent documents show how these have been distilled down to 4 key challenges: meeting development needs in the context of a shortage of land; protecting the built and natural environments; promoting social inclusion through regeneration; and addressing climate change. Whilst the spatial issues are not spelt out in the submitted plan, these key challenges provide a sound and reasoned focus for the plan. These broadly reflect national, regional and community priorities and strategies. Based on the evidence I have received I conclude that, subject to detailed comments below, the plan is soundly focused on those issues important to the area.
- 4.2 The role of the city in the region and sub-region is well established. The RSS expounds and develops the role and function for the city, which this Core Strategy reflects. The city should continue to grow and build on its successful components for the benefit of the city itself, the sub-region and indeed the wider region. The Core Strategy adopts this approach and seeks to achieve this role for Oxford in the context of very tight administrative boundaries and extremely limited amount of available space. Options for growth are bound to be limited.
- 4.3 The preferred strategy has emerged following consideration of a limited number of options. This reflects the very restricted choice available within the city to meet the considerable demands being placed upon it. Oxford is largely built-up, with few remaining areas of open land free of significant environmental constraints. It is quite apparent that not all the city's needs could be met from brownfield sites and that it would be necessary to consider the identification of the few remaining undeveloped, greenfield sites over the plan period if the plan is to achieve the role that is ascribed to it. Accordingly, as part of the development of this strategy, the Council looked at the few remaining large areas of undeveloped land of 10 ha or more.
- 4.4 Of the 4 areas identified through a sieving process, Northern Gateway, Barton, Summertown and Southfield Golf Course, the first three have been included within the strategy, all three having previously been identified as safeguarded land in the Local Plan. The golf course has rightly been excluded from consideration because of the significant ecological and hydrological constraints identified (CDs15/5 to 15/7) and its importance in recreational terms. It remains protected by saved Policies SR2 and NE20 of the Local Plan and Policy CS13 of this plan. No further action is needed in this respect.
- 4.5 No other large site, free of significant constraints, has been suggested during the plan preparation process or to the examination for inclusion within the strategy. Because Oxford is a small city, with tightly drawn boundaries, there is relatively little difference between them in broad location/sustainability terms. Sequentially, there is no compelling reason to prioritise between them on sustainability grounds. The individual merits of the identified strategic sites are considered in more detail later in this report.

- 4.6 A significant element of the strategy, arising from the spatial portraits and the evidence of significant areas of deprivation, is aimed at the regeneration of some of the more deprived areas of the city, both in terms of physical, housing-led renewal of the housing stock and spin-off development arising from the strategic developments proposed in the plan. The physical opportunities of a housing-led approach appear to be reflected in the plan, although I understand from the evidence that the programmes of action look wider than the purely physical. The Council has a good record of regeneration activity (CD15/9) and is preparing a detailed Regeneration Framework document (CD7/4), which will provide the focus for activity across the selected areas. I have no reason to think other than that this theme, reflected in Policy CS3, is well founded and should be effective in significantly upgrading these areas and contributing to the improvement of the existing housing stock.
- 4.7 I accept that the city is geographically a small area, but, nonetheless, there are clearly distinct communities, with their own characteristics, to be found within the built-up area. The Revised Submission Document now provides a better spatial portrait of these communities within the city and a greater sense of what changes are likely to happen in each area. The plan, perhaps a little surprisingly, under-plays the role and impact of the two Universities in the city, generally and in particular, on certain residential areas. One area under particular pressure is Headington, where an expanding University and health related developments threaten to upset the balance of the community. Whilst some form of action-orientated, area-based plan for this community, drawing together all issues, might be welcome, I fully recognise that the Council are committed to a full programme of plan production over the next few years, which will include looking at land allocations in this area. The absence of such a plan for this community does not go to the soundness of this Core Strategy, though the particular pressure on, and needs of, this community is something that the Council may wish to consider in some form over the next few years.
- 4.8 Overall, the submitted plan tends to concentrate upon land uses and land-use based issues, for example the focus on employment development, with little emphasis on "smart growth", as promoted by Policy RE5 of the RSS. It appears to have been largely driven by land use considerations and what limited coverage there is of services such as education and the health provision focuses in on land use needs, rather than on the wider contribution to the way places and communities might develop and change over the plan period. To some degree, the raft of changes in the Revised Submission Document does achieve a better concentration on place and the sense of how the plan seeks to influence and change those places over time.
- 4.9 Nevertheless, there is limited sense within the plan itself of how it can provide the driving force, imposing a spatial dimension which draws together all activities and actions of all the various agencies and influences that can have a spatial impact across the city. That said, it became clear from the discussions at the hearing sessions that underlying much of the policies and proposals in the plan is a pattern of cross-agency working and the bringing together of relevant bodies to achieve the desired aims of the plan. It is regretted that this aspect does not feature more centrally in the plan, but overall I am satisfied that any weakness here does not unacceptably undermine the soundness of the plan.

Responding to climate change

- 4.10 The Core Strategy's Vision and Objectives fully recognise the importance of responding to climate change. The broad approach of the policies on the location of new development, the re-use of previously developed land, the efficient use of land and meeting as many needs as possible within the city itself all help to achieve a sustainable pattern of development which should help to minimise the need to travel and encourage the use of non-car modes of travel. Policy CS10 specifically requires all developments to optimise energy efficiency. The Natural Resource Impact Analysis SPD (NRIA) (CD7/10) develops the approach to achieving resource-efficient buildings.
- 4.11 The RSS contains a number of policies, including CC1-CC4, which seek to achieve sustainable development and mitigate and adapt to climate change. Policy CC2 contains specific targets for CO₂ reduction. The PPS1 Supplement on Climate Change indicates that the opportunities for Core Strategies to add to the policies and proposals in the RSS should be considered. In effect, the Council is already doing this. Although the Core Strategy itself contains no such target, the Council indicates that the operation of the NRIA approach has worked well, in practice operating a higher target than that in the RSS. It is the intention of the Council to carry out further work on carbon emission reduction and the use of resources as part of the work for the Development Management DPD, which will reflect the very latest thinking on these issues and develop any appropriate targets, taking into account viability considerations.
- 4.12 In these circumstances, I do not consider that it is necessary for the Core Strategy to set out a specific target for carbon emission reduction in the city. National and strategic policies will apply alongside the Core Strategy and will guide the work on the Development Management DPD. Nor is it necessary to set out precise requirements in terms of energy efficiency for the strategic sites. These all fall within the NRIA approach. However, to avoid any possible misunderstanding, clarify the Council's overall approach and bring it into line with national guidance it would be helpful to add to the start of Policy CS10 an over-riding, general commitment to minimise carbon emissions.
- 4.13 **In order to make the Core Strategy sound, the following change should be made: The addition of the following at the beginning of Policy CS10: "All developments should seek to minimise their carbon emissions."**

Flooding – Policy CS12

- 4.14 The Environment Agency indicated at the hearings that it was content that the changes made to the plan at Revised Submission Document stage meet its concerns, although it does have outstanding concerns relating to the West End area of the city, to which I refer later in this report. The Council has carried out a strategic flood risk assessment (CD14/25), together with an addendum on groundwater flooding (CD14/31) and applied a sequential approach in its search for developable sites (CD5/7). The policy accords with the guidance in PPS25 on flood risk assessments and its sequential and exceptions tests. It refers to flood risks from any source and, in paragraph

3, provides for sustainable drainage systems. Thames Water has confirmed to the Council that it has modelled Oxford as a whole and that the capacity of sewerage infrastructure is not an issue. There do appear to be localised problems in terms of sewage overflow. These are matters best taken up at the local level. I am satisfied the plan is sound in respect of its approach to flooding issues.

Green Belt

- 4.15 The RSS, at Policy CO4, provides for the Green Belt to be maintained around Oxford, with a selective review of its boundaries on the southern edge of the city to provide for an urban extension. That involves land outside the city's administrative boundary. Within Oxford, Core Strategy Policy CS4 provides for the general extent of the Green Belt to be maintained. It does, however, go on to indicate that the Northern Gateway AAP and the Site Allocations DPD will consider the potential for any small-scale review of boundaries, with land only then being released in exceptional circumstances and where defined criteria are met.
- 4.16 There is no national or strategic basis for a general review of the Green Belt within the city. This is properly reflected in the first part of Policy CS4. Indeed, in any event, much of the Green Belt within the city is also within the flood plain or is subject to significant other constraints. There can be no doubt at all that the Green Belt plays an extremely important role in terms of the setting, form and character of the city. The arguments for maintaining the Green Belt are compelling. However, the effect of the second arm of Policy CS4 could be thought of as potentially undermining its role.
- 4.17 The Council, in the context of a severe shortage of land, undertook a broad-brush exercise to see if there were any areas of Green Belt that might be released for development. As a result of that, only two areas were identified as potentially available, without harming the area's environmental assets – land around the Northern Gateway development and land along the edge of the Marston Gap. The Council does not envisage that large areas of that Gap would be appropriate for development.
- 4.18 Paragraph 22.18 of the RSS sets out the exceptional circumstances that exist for the review of the Green Belt, which led to the policy for a selective review at the southern edge of the city. Those exceptional circumstances relate to the city context and justify that selective review and, in turn, the proposal for an urban extension to the city. I do not consider that they should necessarily be applied in the same way to a small-scale review of the inner edge of the Green Belt within the city, where more localised circumstances will apply. Clearly, there are extremely strong pressures for more housing and employment development in the city. However, as I conclude below, there is a very robust housing supply within the city, with provision likely to exceed the RSS figure. Suitable employment development, with the Northern Gateway site, can be achieved without further encroachment elsewhere into the Green Belt. Outside the particular circumstances of the Northern Gateway site, at a local scale, I do not consider that there is likely to be an exceptional need to nibble away at the edge of the Green Belt that might justify the approach in Policy CS4.

- 4.19 The obvious danger of this open-ended part of Policy CS4 is that it could create a considerable degree of uncertainty along the whole length of the edge of the Marston Gap and, indeed, anywhere else within the Green Belt. I accept that the policy requires that any land release demonstrates exceptional circumstances and that detailed criteria would need to be met. Nevertheless, bearing in mind the guidance in PPG2 about permanence, I do not consider that in general terms exceptional circumstances necessarily exist for this development plan to allow for unspecified small scale redrawing of the boundaries.
- 4.20 For this reason, I conclude that the policy allowing for small-scale review of the Green Belt across the city is contrary to national guidance and is not justified. However, I consider that different circumstances apply to the potential for very small-scale release of Green Belt land at Northern Gateway.
- 4.21 As I have concluded elsewhere, I support that development, which forms a significant plank of the overall strategy. A sizeable area of safeguarded land is readily available. The RSS, at paragraph 22.9, indicates that the options regarding the location, level and form of the development, including the possible use of land at and in the immediate vicinity of the currently safeguarded land will be a matter for local determination. Thus, the RSS clearly contemplates the possibility of use of land in the immediate vicinity of the safeguarded land.
- 4.22 Some of the land in the vicinity of the safeguarded land is within the Green Belt, though not all. Whether additional land to the safeguarded land is needed, and more relevantly, whether that includes parcels of Green Belt land, is much more a matter for detailed determination at master-planning stage, rather than at this Core Strategy level. There clearly is a very strong needs case for a strategic development here and there is some prospect that exceptional circumstances could provide for the inclusion of some Green Belt land within the development site, without undermining the function of the Green Belt in this area. For that reason, I am content that the indicative boundary shown for the proposed AAP includes Green Belt land. However, it is not for this Core Strategy to categorically state that the exceptional circumstances exist for particular parcels of land to be taken out of the Green Belt. That is something that detailed master-planning, through the preparation of an AAP, can more appropriately determine.
- 4.23 In the interests of maximising the potential of this important site and allowing for the most suitable and appropriate location, level and form of development to deliver the needed economic growth, I support the inclusion of a reference to a possible small scale release of Green Belt land in the Northern Gateway area. I recommend a change to the wording of the policy to limit any small-scale release of land to the Northern Gateway area only. I do not support any revision to the supporting text, which simply refers to a review of boundaries in this area. In view of this change, I support the retention of the wording referring to the “general extent of the Green Belt” in the policy.

- 4.24 In order to make the Core Strategy sound, the following change should be made: The deletion of the third and fourth sentences of Policy CS4 and their replacement by: “The Northern Gateway AAP will consider small scale, minor changes to the Green Belt boundary in the immediate vicinity of the currently safeguarded land, where this may be necessary to achieve a suitable and appropriate site for development. Land here will only be released from the Green Belt if exceptional circumstances are shown to exist and all the following criteria are met”**

The scale of new housing and employment development and the homes/jobs balance

- 4.25 ***Housing supply*** The RSS requires, in the period to 2026, the provision of 8,000 new homes within the city, together with 4,000 homes in the South of Oxford Strategic Development Area (SOSDA). The Council undertook a SHLAA (CD14/1) in 2008, updated in April 2009 (CD15/1) which demonstrates quite conclusively that the RSS requirement of 8,000 additional homes within the city can be readily achieved. It shows a 5 and 10-year land supply, in accordance with PPS3's guidance. Past evidence indicates that the Council is likely to exceed the RSS requirements as Oxford has a very buoyant housing market and the Council expresses no wish to treat the 8,000 figure as any sort of ceiling. Completions in recent years have been well in excess of the RSS annual requirement (CDs 16/25 and 16/56).
- 4.26 The achievement of a 15-year supply of housing is dependent upon a sizeable contribution from windfalls. That is understandable in a city that is already substantially built-up. The scale of windfalls needed to make up the 15-year supply represents only a relatively small fraction of past windfall provision. Appendix 4 of the Core Strategy demonstrates that to make up the 8,000 dwelling target over the period to 2026 would require 119 dwellings per annum from windfalls. That figure is very substantially below the recent provision from that source. A large proportion of those windfalls are provided on small sites below the site size threshold adopted by the SHLAA (CD16/56).
- 4.27 So, even if it were to be assumed that the SHLAA has identified all larger sites that are likely to come forward to 2026, there is still likely to be a substantial supply coming forward from these small sites to make up any shortfall over the longer term. The plan identifies a conservative 170 dwellings per year from windfalls, which would lead to an overall provision to 2026 of about 10% above the RSS requirement. I have no doubt that supply from that source will make up any longer term shortfall from identified sites.
- 4.28 The SHLAA reflects national guidance and provides a robust evidence base to support the housing figures and I am fully satisfied that the Council's optimism in this respect is soundly based and Policy CS23 is well founded. I have considered the evidence in the Council's Asset Management Plan (CD7/26), but find nothing there to suggest that the conclusions reached in the SHLAA are misplaced or that the contribution from the strategic sites is not required during the plan period.

- 4.29 Policy CS23 provides for a plan, monitor and manage approach to housing delivery, through the Annual Monitoring Report. The policy commits the Council to review and take action on housing supply should completions fall materially below the trajectory rate.
- 4.30 South Oxfordshire Council has commenced work on the SOSDA and I have no evidence before me to suggest that provision for the 4,000 extra dwellings from this urban extension cannot be made before the end of the plan period. It is unclear as to how much employment provision should be made within the SOSDA. It is too early for any firm decisions on that matter. That will be for the future master-planning of the area.
- 4.31 I conclude on housing land supply that the Core Strategy is soundly based, fully justified and will be effective in delivering the required levels of housing.
- 4.32 **How much employment land?** Similar specific requirements to the housing numbers are not provided in any direct form for employment growth in the city itself. Rather, the emphasis in guidance reflects Oxford's evident strengths. The RSS is supportive of Central Oxfordshire striving to be a world leader in education, science and technology by building upon the sub-region's economic strengths (Policy CO1). Policies CO1 and CO2 and the supporting paragraphs, 22.1 to 22.11, highlight the sub-region's world class economy and establish the role of the city and its importance to the sub-region and to the wider south east. Paragraph 22.5 of the RSS indicates that "Oxford itself will be allowed to grow physically and *economically* (my emphasis) in order to accommodate its own needs, contribute to those in the wider region and help maintain its world class status".
- 4.33 This reflects SEEDA's Regional Economic Strategy (CD10/5) and the city's position in the Oxford to Cambridge arc; the sub-region's designation as a Regional Economic Strategy Diamond for Investment and Growth and the identification of the city as a Regional Hub. Whilst recognising the need to protect and enhance Oxford's historic character and environment guidance clearly envisages continued employment development to enhance the city's economic role. Understandably, RSS Policy CO2 expects new employment in Oxford to take place primarily on previously developed land and former safeguarded land and/or in conjunction with mixed-use schemes.
- 4.34 The RSS identifies a guidance figure of a minimum of 18,000 additional new jobs being created within the sub-region to 2016. No figure is given for the city itself, though the County Council suggests that this would equate to about 7,000-7,500. Undoubtedly, for national and strategic reasons, Oxford has an important role to play in the future prosperity of the area and further economic growth is envisaged to reflect its position. The RSS does express specific concern in relation to the impact of possible development at the northern edge of the city (which I comment further on in the section on the Northern Gateway strategic site) but it does not seek generally to limit the scale of employment growth in the city. There is no convincing evidence that a policy of restraint within the city would be appropriate. There can be no doubt that the Core Strategy is right to provide for a degree of continued growth.

- 4.35 However, there are constraining influences in terms of protecting the special quality of the city and achieving a sustainable pattern of development across the sub-region. The RSS also goes on to say, at paragraph 22.7, that over the whole plan period there is a need to ensure that the balance of jobs and houses at main settlement level does not worsen and preferably improves. Paragraph 22.9 states that in Oxford the overall aim will be to achieve a broad balance between housing and jobs.
- 4.36 The RSS jobs forecast to 2020, used by SEEDA at the RSS examination, was based upon forecasts made in the autumn of 2006. Since then, forecasts in autumn 2008 reduce the figure by approaching one half. Nevertheless, as the RSS Supplementary Guidance (CD10/12) goes on to point out, core strategies need to appropriately contingency plan, with an expectation that considerations should include an economic growth level scenario that broadly accords with the vision for the South-East in the RSS. It comments that when, and how quickly, the economic up-turn will happen is unknown but it is important that core strategies are appropriately flexible and can respond quickly to change. The RSS figures are still considered very relevant to core strategy preparation, to ensure flexibility and responsiveness.
- 4.37 The Core Strategy is seeking to plan for the long term and notwithstanding the current economic difficulties, it is reasonable to make assumptions that the economy will pick up. As explained by NLP at the hearings, the forecast of future demand in the Oxford Employment Land Study 2006 (OELS) carried out by NLP (CD14/27) uses a 2004 base, midway between the dot-com crash and the current credit crunch. Whilst there is a current dip in activity, the plan is a long-term one, covering the next 17 years. History points to a cyclical economic climate and there is no compelling reason to believe that the economy will not pick up again at some stage and resume a pattern of longer-term growth.
- 4.38 **Proposed employment land provision** Through Policies CS28-CS33, the Core Strategy seeks to meet demand through managed growth, supporting the city's key employment sectors and clusters, at a scale that allows for some continued improvement to the homes/jobs balance. The policies focus on brownfield land through the protection of existing key employment sites, existing commitments, with modest growth in the town centre, all of which are unlikely to have a material effect upon the historic character and setting of the city, together with a single, large strategic employment site at Northern Gateway, focused on safeguarded land. The impact of that proposal is considered in detail later in this report.
- 4.39 The demand for land arises almost entirely from Class B office jobs. Much of the provision for new employment is properly based on brownfield sites and on-going commitments, such as the Oxford Business Park and the Oxford Science Park. However, there is a limited supply of this. The OELS identifies a total supply of 32.5 hectares and a further, net employment land need to 2021 of between 13.5-36.5 hectares on a "business as usual" basis and between 20.5-47.5 hectares on higher growth assumptions. In order to build in some flexibility and choice, it is always preferable to look at a level of provision above the lowest figure of need, bearing in mind, too, that the plan runs through to 2026.

- 4.40 There has been some question over the precise details of sites and buildings in the Business Parks that should be considered as being available at this time. Of the evidence submitted, I prefer that given by the Northern Gateway prospective developers who have detailed, inside knowledge of the position. Nor is it clear how the evidence submitted of the many empty premises available across Oxford relates to the overall need for a range of premises of the right quality, in the right location suitable for Class B uses. I am not persuaded that the evidence submitted of empty premises negates the overall picture that there is an undoubted need for the identification of additional employment land for Class B uses. There will always be some proportion of the stock available at any one time and it is not surprising, at this point in the economic downturn, that there are plenty of properties on the market. A longer-term view must be taken of needs and requirements of the businesses that will help to drive the economy of the area right through to 2026.
- 4.41 In my view, the OELS provides a sound basis for concluding that beyond existing commitments there is a sizeable quantitative need for further employment land in Oxford. Its “business as usual” scenario reflects established economic relationships with the area around and does not seek to materially alter that approach. The scale of development proposed in this plan is constrained by land supply. Oxford cannot meet all its own needs from existing commitments and a significant element of the longer-term growth will have to take place on previously undeveloped land.
- 4.42 The need is much more than just a quantitative one. It is also very much a qualitative one. Both the Science Park and the Business Park, which provide the opportunity for high quality Class B development, are, based upon past longer-term take up rates, likely to be completely built out by 2016 or very soon thereafter. Outside those Parks, there are relatively few opportunities for significant, good quality office developments attractive to Oxford’s key sectors. As the OELS states, a shortage of suitable space in Oxford could threaten the city’s role as a leading centre of knowledge-based industries.
- 4.43 ***The homes/jobs balance*** Historically, Oxford has provided many more jobs than homes, with significant levels of in-commuting to work. Whilst there is some dispute about the precise homes/jobs ratio, it would appear that the lack of balance has been diminishing over the past 40 years. Evidence produced for the Structure Plan EiP in March 2004 (CD5/14) shows that in 1971 the ratio was 1:1.76 and in 2001 1:1.44. The 2006 figures suggest a further decrease. Whatever the exact current position, there continues to be a large imbalance, leading to significant in-commuting into the city, associated congestion, pressure on the housing market and the economic buoyancy of the wider sub-region. The issue here, one that is important to the Core Strategy, is what balance should be sought between housing and employment growth?
- 4.44 At the moment, the revised Core Strategy itself offers little clarity and explanation as to the anticipated impact of its policies on the overall balance. At my request, the Council has put forward more specific information on the implications of its strategy on the homes/jobs balance (CDs 16/53-16/55). CD16/54 shows that the projected housing numbers are likely to generate about 8,000 additional economically active people by 2016 and a little over

16,000 by 2026. Given the likely achievement of housing numbers over this period and the basis on which these figures were calculated, I consider that these figures are soundly based.

- 4.45 Forecasting job growth is extremely difficult and of necessity, depends upon a range of assumptions. Based on the availability of sites and on the likely prospects and capacity for changes in employment levels in the non-B Use Class sectors, I am content that the figures provided give a helpful guide as to the implications of the strategy on the homes/jobs balance. The figures in CDs 16/53 & 16/55 suggest that the Core Strategy successfully provides for the appropriate growth of the local economy, whilst achieving an overall reduction in the imbalance between homes and jobs.
- 4.46 CD16/53 provides upper and lower growth scenarios for jobs for 2016 and for 2026, based upon a capacity assessment, taking into account estimates of employment growth on existing sites, commitments, new allocations and other sectors. The Council's baseline figures (CD5/5) indicate a homes/jobs ratio of 1:1.28 in 2006. By 2016, with a growth of between 8,000 and 10,680 jobs, this is projected to be in the range of 1:1.25 to 1:1.28, i.e. very little change; but by 2026, with a growth of between 11,280 and 14,900 jobs, this indicates a significant improvement to a ratio of 1:1.18 to 1:1.21.
- 4.47 The reference in paragraph 22.9 of the RSS to achieving a broad balance between housing and jobs in Oxford might be read as meaning either that there should be complete parity between homes and jobs in the city by 2026 or, alternatively, that there should simply be a parity between **additional** jobs and **additional** homes. Paragraph 22.7, in talking about a preferable improvement, points to a position somewhere between this. Achieving a complete balance by 2026 is unrealistic in that it would unduly constrain growth of Oxford's world-class economy. In any event, successful cities are always likely to draw in a significant element of their work force from outside areas and it seems impractical to aim to achieve an absolute parity.
- 4.48 To aim for a simple parity between additional homes and additional jobs would only marginally improve the overall position. Further, although the level of self-containment in Oxford is high, it has fallen from 84% to 76% between 1991 and 2001 (CD14/27). On the other hand, restraint on new jobs within the city could further reduce the degree of self-containment, possibly leading to increased levels of out-commuting. For these reasons I am satisfied that the Council is justified in trying to provide for growth whilst looking to improve the homes/jobs balance.
- 4.49 **Relationship with the wider Central Oxfordshire area** The other factor to consider here is the impact of the level of growth proposed on the buoyancy of the wider Central Oxfordshire area and its world-class economy. The OELS did not look outside the city at wider issues and offers little advice on the relationship between the city and the surrounding region. Whilst the RSS covers this matter in fairly general terms, I do not have the benefit of a recent, explicit sub-regional plan looking in more detail at the balance between Oxford and its sub-region. There has been a longstanding strategy for economic development across a number of the towns in the sub-region. The RSS continues to provide for this, with specific mention of the roles of Bicester, Didcot, Wantage/Grove area, Witney and Banbury, and expresses

specific concern about not adversely affecting the economic buoyancy of areas to the north of the city.

- 4.50 As the South East England Development Agency (SEEDA) indicated at the hearings, there is an "Oxford effect", an Oxford brand, with Oxford, with its high skilled, knowledge-based businesses providing the economic driving force for the area. Reflecting the international nature of this sector, some firms want to come specifically to the city but not to outlying towns. They require a base with an international profile. Others would be happy to associate with the city but chose one of the nearby towns. SEEDA considers it important that Oxford provides the opportunity for those companies that want to come to the city and welcomes the identification of a new strategic site which would help to deliver employment land for high-value businesses.
- 4.51 Particular concern has been expressed about the impact upon Bicester. The Cherwell Employment Land Review indicates that development there has been very slow, though it was suggested at the hearings that the economic potential there is about to be realised. That appears to have been the position for some time and there is no certainty that placing a restraint upon the development in the city would bring forward significant development in that town. Conversely, it is conceivable that the further development of knowledge-based businesses in Oxford could help to stimulate further growth in the wider area, which could then be accommodated in towns such as Bicester, as part of a growing knowledge-based employment cluster.
- 4.52 Undoubtedly, there are many businesses that are happy to trade on the Oxford brand whilst locating in one of the nearby towns. Nevertheless, as SEEDA indicates, there will be many firms that would look to a more prestigious location, in Oxford itself or otherwise go somewhere outside the sub-region; any expansion within the city can sit alongside other projects being supported by them, including the growth of Bicester. Unnecessary constraint on the economic potential of Oxford should be avoided as far as is practical and reasonable. I consider the Council is justified in coming to the view that there does need to be growth both within the city and across the sub-region. It is not an either/or situation. That view appears to be confirmed by the GOSE letter of June 29th 2009 (CD16/51).
- 4.53 For all these reasons, I conclude that the Core Strategy's approach to the scale of housing and employment growth and the resultant homes/jobs balance is well founded. There is a need for the plan to identify a substantial additional opportunity for Class B development in the city to enable the city to fulfil its role, a role reflected in the RSS. Without that additional provision over the plan period, the key sectors of the city economy would be unreasonably constrained and placed at a disadvantage compared with other competing locations. The strategic site chosen to accommodate this employment growth is at Northern Gateway. The appropriateness and suitability of this choice is examined later in this report.
- 4.54 The Revised Submission plan lacks clarity about the impact of the strategy on the homes/jobs balance and how it will change over time. This is an important aspect of the strategy. The inclusion of this information would strengthen the plan and, accordingly, I recommend that the further detail produced by the Council be included within the Core Strategy.

- 4.55 **In order to make the Core Strategy sound, the following changes should be made: The plan be amended in accordance with the changes set out in CDs 16/53 to 16/55.**

This recommendation is covered in the Council's Further Proposed Changes (April 2010) (CD1/3) and later amendments made at the resumed hearing sessions

Other housing issues

- 4.56 ***Housing density*** The Core Strategy contains no policy setting out required minimum housing densities. The supporting text and Policy CS24 refer to the city centre and district centres being suitable locations for higher density developments. PPS3 sets out a national indicative minimum density in order to ensure efficient use of land. The RSS, in Policy H5, looks to encourage higher housing densities, with an overall regional target of 40 dwellings per hectare, local authorities being expected to reflect this target with appropriate variations in their own plans.
- 4.57 The Council, moving away from the approach in Policy CP6 of the Local Plan (CD7/6), indicates that the key issue is the achievement of good design and efficient use of land with an appropriate mix of housing to meet local needs. It relies upon the Balance of Dwellings SPD (CD7/14) which seeks to ensure good design and a suitable mix of housing, which itself will have density implications, but without identifying specific density levels. Historically, whilst the Local Plan required development of 40 dph, in practice, delivery has been at a higher level, reflecting the constrained nature of the city and its buoyant housing market.
- 4.58 Broadly, the strategy approach reflects much of the tenor of PPS3 on the effective and efficient use of land. In the context of a city where the pressure for new housing is likely to result in high densities, it is not unreasonable to place the emphasis firmly on achieving good design and the right mix of housing, rather than on prescriptive density levels. There is no need for this plan to reiterate national or regional policy. In these circumstances, I do not consider that the plan's approach is out of conformity with regional or national guidance in this respect. There is little to be gained by defining specific density levels across the city and/or in the district and city centres. However, a minor rewording of the supporting text to Policy CS24 would help to clarify the Council's position and to reflect national and regional guidance.
- 4.59 **In order to make the Core Strategy sound, the following change should be made: The deletion of the sentence "Developments tenure" in paragraph 6 of section 7.2 and replacement by: "Developments will be expected to make efficient use of land, and reflect the guidance on densities at national and regional level. Specific density standards are not prescribed in this plan because the emphasis is firmly placed on the achievement of an appropriate mix of dwelling types, sizes and tenure."**

- 4.60 A balanced mix of housing** A Strategic Housing Market Assessment (SHMA) (CD14/5) has been carried out. This has been supplemented by the Council's Balance of Dwellings Study (CD14/3), feeding into the Balance of Dwellings SPD (CD7/14), which underlies the application of Policy CS24. The policy leaves all the detail to the supporting SPD. Given the degree of detail and specificity, it seems logical and reasonable to leave this to the SPD and not include any further detail within this Core Strategy.
- 4.61 Policy CS24 refers to a balanced mix being delivered within each site, whereas Policy WE15 of the adopted West End AAP (CD7/5) sets out a detailed mix for that area as a whole. I see no fundamental inconsistency here. The AAP does not allocate individual sites, but looks to define a mix for the whole of the area within which individual schemes can be considered. It develops the Policy CS24 approach for the particular circumstances of this particular area. It is not for me to revisit the recently adopted AAP in this respect. Outside of that area, a site-by-site approach is more appropriate, based on the soundly researched approach in the SPD. The SPD approach does allow for a range of proportions of dwelling types and is not over-prescriptive. I have no firm evidence that the requirements of the policy are proving too inflexible.
- 4.62 The Core Strategy gives little direct guidance on specialist housing and is silent on the need for elderly accommodation. The Council intends to consider any site development issues as part of its Site Allocations DPD. Whilst not going to the soundness of the plan, the Council may wish to consider whether and how further consideration should be given to this matter.
- 4.63 **Affordable housing – Policy CS25** There can be no doubt that there is a considerable unmet need for affordable housing in the city. Policy CO3 of the RSS sets a requirement of at least 40% affordable housing across the sub-region, a figure higher than for the South East as a whole. At paragraph 22.16 it goes on to comment about the situation in Central Oxfordshire and the problems particularly within Oxford and that the indicative target should be used to guide DPD preparation. The Oxfordshire SHMA (CD14/5) shows that annual demand for affordable housing in Oxford for the first five years of the plan far exceeds the total RSS housing requirement for the city. Oxford is the 10th least affordable district in the South East, with the very recent Centre for Cities Report identifying Oxford as the least affordable city in the country (CD 16/28). In these circumstances, the Council is entirely right to seek to maximise the provision of affordable housing.
- 4.64 Policy CS25 provides for a minimum contribution of 50% affordable housing from qualifying sites (0.25 hectares or more or 10 dwellings), reflecting the current Local Plan Policy HS5 requirement. Bearing in mind the non-contribution from the many small sites, the 50% requirement on qualifying sites is fully justified, as is the slightly lower threshold than the PPS3 15 dwellings. The key issue is whether this is realistic and achievable. A Housing Viability Study was undertaken by consultants in April 2004 (CD14/4), with a further study (CD14/2) prepared in April 2007, by the District Valuer Service, in connection with work on the Planning Obligations SPD. The former looked at 14 sites, all but one of which with a capacity of 20 plus dwellings. This shows that without grant all the sites would still achieve a

positive residual value with 50% affordable housing. The latter considered 12 sites, from about a quarter of a hectare upwards, and concluded that 9 out of the 12 should be able to meet the affordable housing as well as the planning obligations SPD requirements.

- 4.65 The Council is able to show that the 50% requirement has proved successful in practice over recent times (CD16/28). Both these studies were undertaken when market conditions were much better than at the current time of writing; the latter study very much close to the peak of the market. Although the market is likely to pick up over the plan period, it cannot be assumed that these studies are a fair representation of market conditions over the plan period. For this reason, the conclusions reached have to be treated with some caution.
- 4.66 There is clear evidence that Oxford has a very buoyant housing market and I would not expect the difficult conditions of the past 2 years to prevail throughout the plan period. There is every reason to think that market demand will remain high in Oxford and that once market finance becomes more readily available then the viability of 50% affordable housing provision will be more easily achieved. There may also be the prospect of some schemes having grant aid through the Homes and Communities Agency. Given the very high level of need, it would not be appropriate to reflect changing economic circumstances over the plan period by reducing the benchmark requirement level. The aim should be to maximise the affordable housing provision without prejudicing the overall supply of housing.
- 4.67 However, some flexibility must be built into the policy to allow for the variety of different market conditions that are likely to be experienced over the plan period. At present, no flexibility, apart from the use of the word “generally”, is built into the policy to reflect the need to be deliverable in terms of market and site conditions and other relevant circumstances. Whilst other matters of detailed application may be left to the Affordable Housing SPD, this issue is of sufficient importance as to need to be included within the lead affordable housing policy. To accord with national guidance the Policy needs to set out how viability will be taken into account. At my request, the Council has submitted changes to the wording of the policy and its supporting text (CD16/57) which allows for the viability issue to be taken into account for individual developments. This specifically allows for consideration of schemes where the 50% requirement is not deliverable, with developers being able to demonstrate what level of provision would be viable on an individual site basis.
- 4.68 ***Affordable housing from commercial developments*** The principle of taking contributions towards affordable housing from commercial developments was established in the Local Plan, at Policy HS7 (CD7/6). The Inspector considering that plan found that contributions could be sought where the need for affordable housing was directly related to the development proposed, for example, where there would be an acknowledged creation of jobs for lower-paid workers. He went on to say that contributions should only be sought where the need for affordable housing would be directly related to the proposed development. A similar policy has also been accepted by the Inspector examining the West End AAP (CD16/50). The application of this established policy is set out in the Affordable Housing SPD

(CD7/9), backed by more detailed studies of the viability of this approach (CDs14/2 and 5/13). The additional wording recommended will provide an element of flexibility and should help to avoid any discouragement to any businesses seeking to establish or expand in Oxford. Provided that this change is made, I consider the approach is soundly based.

4.69 In order to make the Core Strategy sound, the following change should be made: The plan be amended in accordance with the wording within CD16/57.

This amendment is incorporated into the Combined Changes to Submission version of the Core Strategy [CD1/5]

4.70 ***Provision for gypsies – Policy CS27*** Discussions, led by the Regional Assembly, have been taking place over the last year or two (CD10/10) with a view to a formal consideration of provision for gypsies to be carried out as a partial review of the RSS, in January 2010. At that time, more definitive regional guidance will be laid down as to any site requirements for the city to meet. The latest indication of requirements contained in the Regional Assembly Recommendations (CD10/11) to go forward to the examination, suggest a need in Oxford for 9 pitches for gypsies and travellers, together with 3 for travelling showpeople. The Council intends then to consider any requirements through its Site Allocations DPD.

4.71 In the meantime, Policy CS27 sets out criteria against which any proposals will be judged. The difficulty for the travelling community is that the criteria apply equally to any residential development and because of the travellers’ requirements necessitating low intensity development, they lose out in the market place on any available site to more intensive main-stream housing. Nevertheless, at the current time, I see no basis for changing the criteria of the policy.

4.72 The gypsy and traveller community suffers a high level of homelessness. However, I do not consider that this should mean that a general exception to Green Belt policy should be enshrined in this policy. Circular 1/2006 continues to treat gypsy and traveller sites as inappropriate development and on that basis, any proposal for a site within the Green Belt would need to show exceptional circumstances. More importantly, the Council has confirmed that the requirement, and how it should be met, will be considered as part of its Site Allocations DPD. That seems to be the most appropriate way of considering this issue.

4.73 ***Student accommodation – Policy CS26*** Policy CS26 continues the approach, set out previously in the 1991-2001 Local Plan and more recently in Policy ED6 of the 2001-2016 Local Plan, of seeking to progressively reduce to a reasonable level the impact of the city’s two universities on the Oxford housing market. The intention of the Core Strategy is to achieve and maintain a maximum of 3,000 full-time students per university competing with the general public for housing accommodation. Given both the very serious pressures on the local housing market and the impact on local communities of concentrations of student accommodation, it is undoubtedly desirable to place controls on the numbers of students living out in the community, to achieve a reasonable balance between the needs of the two

- universities and those of the general public. The placing of an absolute ceiling on total student numbers would be a wholly unreasonable restriction on their activities, contrary to national and regional guidance and could impact unacceptably on their contribution to the prosperity of the wider area.
- 4.74 At present both Universities exceed the 3,000 figure for full-time students accommodated in general housing. The approach in Policy CS26 relates to full-time students only, as part-time students are likely to have different accommodation needs. The current figures from the Annual Monitoring Report show 3,221 University of Oxford (UoO) students and 3,425 Oxford Brookes University (OBU) students competing in the housing market. These figures were challenged at the hearings. They have been provided by the Universities, based upon student data records, and in the absence of compelling evidence to the contrary, I am satisfied that they provide a reasonable basis to make an assessment of the current situation.
- 4.75 The UoO is looking to maintain undergraduate levels and, given its actions in this respect and the availability of its land holdings, the Council is confident that it will be able to achieve the 3,000 figure without undue difficulty.
- 4.76 OBU, on the other hand, has a bigger task to reduce numbers to the 3,000 level, whilst at the same time looking for a year-on-year growth, potentially in the region of 1% per annum, in undergraduate numbers. The achievement and long-term maintenance of a level below the 3,000 figure represents a much more substantial challenge. The Core Strategy itself gives no indication as to where any extra accommodation should be provided. The OBU is seeking a commitment within the plan to give priority to its needs over any other within a defined radius of its Headington campus.
- 4.77 The wish to make provision for students close to its Headington campus is understandable. However, I do not consider it is the role of this Core Strategy to specifically allocate sites for student housing or suggest that certain pieces of land were suitable or not for student accommodation or other uses. The wording change made by the Council to Policy CS31 has a bearing on this, though I do not consider that this fundamentally changes the position. Local Plan allocations remain extant. In any event, I do not have sufficient evidence to come to a conclusive position on priorities between competing land uses, such as from the hospitals, within a certain area. Whilst desirable for the University to have its student accommodation close to the campus, that is not the only possible geographical solution. Oxford is a compact city with good public transport provision. Other institutional uses in the Headington area may have their own requirements to weigh in the balance.
- 4.78 There are also in-principle issues to consider about the impact of the concentration of institutional uses and student numbers within a tightly defined area. The community in Headington, for example, has seen considerable changes and it is felt by many that the concentrations of students in such areas have undoubtedly had a considerable adverse impact on the sense of community and on general living conditions there. In seeking to make provision for the needs of the OBU, these are matters to which careful consideration will need to be given, at both local and city level. That is something that can best be done through subsequent DPDs, involving

a more detailed analysis of the issues and possible solutions to meet needs whilst sustaining the communities concerned. It is also open for the Council, outside of this Core Strategy, to consider area-based action programmes to reduce the impact of concentrations of students within residential areas.

4.79 Having regard to the sites with planning permission for purpose-built student accommodation, other Local Plan sites (CD16/31) and the Council’s commitment to prepare a Site Allocations DPD, which will include consideration of this need, I am confident that the OBU can meet the Core Strategy target.

4.80 Thus, I come to the view that a ceiling figure of 3,000 is realistic and achievable well within the plan period and could be maintained thereafter. However, a figure materially below the 3,000 level could be difficult to achieve, impacting upon the wider housing market and/or on the continued success of the Universities and their contribution to the local economy. I conclude that the approach of the policy is soundly based and should be effective in reducing and then stabilising the impact on the general housing market and local communities.

4.81 The policy restricts the provision of student accommodation to that related to the Universities, effectively placing an embargo on student accommodation to serve the needs of the many non-university colleges in Oxford. The Council points to the greater emphasis of these other colleges on part-time courses and that a lot of their students take up lodging accommodation, so not adding to the pressures on the city’s housing stock and limited development sites. Nevertheless, some of the students at these other colleges will be full-time and are just as likely to require housing out in the community and put pressure on the housing market. Where full-time students are on courses of upwards of an academic year, it seems to me that they are as likely as University students to be seeking their own housing as opposed to lodgings.

4.82 Whilst removing the policy embargo would increase the competition for any available sites, provided any new accommodation was directed to full-time students, then the impact on the overall housing market would be very limited. These colleges also make their contribution to the local economy. I find little reason, in terms of housing pressures, to discriminate against non-University colleges. It is not justified in equity terms and I propose some wording changes to reflect this. Detailed consideration of the needs of the non-University Colleges can be looked at as part of subsequent DPDs.

4.83 The current wording of the policy is confused and unclear in its meaning. In order to make the plan sound, I recommend some revised wording which seeks to clarify its intent and application, without necessarily conflicting with any specific policies applicable to the West End in the West End AAP.

4.84 In order to make the Core Strategy sound, the following changes should be made:

- i) The deletion of Policy CS26 and its replacement by: “Planning permission will only be granted for additional academic/ administrative accommodation for the University of Oxford and Oxford Brookes University where that University can demonstrate: in the first place that the number of full-time students at that University, who live in Oxford but outside of university-provided accommodation, will, before the particular**

development is completed, be below the 3,000 level and once that figure is reached, thereafter will not exceed that level. All future increases in student numbers at the two Universities as a result of increases in academic/administrative floor-space must be matched by a corresponding increase in purpose built student accommodation.

Student accommodation will be restricted in occupation to students in full-time education on courses of an academic year or more. Appropriate management controls will be secured, including an undertaking that students do not bring cars to Oxford.” and

- ii) **The deletion of the sentences “In addition of Oxford.” and “Student accommodation built Development Management DPD.” from the second paragraph of section 7.4 and their replacement by: “In addition, all new student accommodation (built either speculatively or directly by the Universities or Colleges) will be restricted in occupation to students in full-time education on courses of an academic year or more.”**

Hierarchy of centres and retailing – Policies CS1 and CS32

- 4.85 ***The hierarchy*** Policy CS1 sets out a basic hierarchy of centres where growth will be accommodated: the city centre; Cowley primary district centre; 4 other district centres and, finally, neighbourhood centres. The city centre is unquestionably the appropriate prime location, at the top of the hierarchy. Cowley stands out amongst the district centres as being the most sustainable centre, well served by public transport, central to a large catchment area and with the potential to expand and accommodate a range and mix of uses. It is justifiably raised in status above the other district centres. These other district centres all serve an important local function, with the smaller neighbourhood centres performing a valuable role at a more local level.
- 4.86 The Core Strategy hierarchy represents an evolution of that set out in the Local Plan (CD7/6). The two main changes involve the designation of Cowley as the primary district centre and the addition of Blackbird Leys to the district centres. This reflects the likely level of need, supports the strategy of reducing the need to travel and helps to promote regeneration. The revised broad hierarchy and pattern of centres offers a well-founded, sustainable, geographical spread of locations where development should be focussed.
- 4.87 Policy CS32 sets a more detailed hierarchy than that of the more general one in Policy CS1 for retail development. This involves a distinction between the primary shopping areas in the city and district centres and edge of centre locations. This accords with guidance in PPS6 and I see no difficulty with the distinction drawn here, compared with the hierarchy in Policy CS1.
- 4.88 ***Retail provision*** The table above Policy CS32 sets out retail requirements for the city and district centres. This is broadly based upon the Oxford Retail Needs Study 2004 (CD14/7) and the Update (March 2008) (CD14/8). The Update has confirmed a relatively modest growth in need for additional comparison retailing floor-space and a small amount of convenience retailing floor-space.

It expresses the need for caution in looking beyond 2016 to the period to 2026. Although some of the base information is now becoming dated, these studies provide a reasonably sound basis for the relatively restrained levels of growth being proposed in the plan.

- 4.89 Sufficient expenditure growth, overall, is identified in these studies to support retail expansion in the city centre, Cowley, Summertown and the newly designated district centre at Blackbird Leys, as set out in the table above Policy CS32.
- 4.90 Most growth is directed to the city centre. The growth directed by the strategy to the district centres is much more modest, but on the evidence available reflects the identified need through to 2016. The strategy, reflecting the need for caution, provides little quantitative guidance post 2016. There will be a need to carry out further analysis of retail need across the city well before the end of the plan period. In the meantime, the levels of growth being planned for seem to be well founded and, assuming the longer-term growth of the economy, there is every reason to consider that there will be the level of expenditure, at the least, to support the scale of new floor-space being promoted.
- 4.91 **The city centre** It is generally recognised that Oxford city centre underperforms as a centre compared with other similar locations. The 37,000 sq m proposed for the city centre through to 2016 appears to be well founded and is largely accounted for by two current schemes. Beyond 2016 it is difficult to predict the capacity for further growth, although there is likely to be some further potential for growth, through the clawback of trade, if Oxford wishes to improve its relative position vis-à-vis other similar centres. This could be substantial, but the capacity for further growth within the primary shopping area is very limited.
- 4.92 To provide for longer-term growth in areas of the city centre outside the primary shopping area could lead to a dispersed pattern of shopping in the centre and would run counter to the strategy of the plan which aims to support the role of the district centres. At this time, and bearing in mind the recent adoption of the West End AAP, it would not be appropriate for this plan to identify the extent and location of any large-scale retail development in the city centre post 2016. That is something the Council will need to revisit within a few years.
- 4.93 **Cowley district centre** The plan promotes this centre to the position of primary district centre and allows for a significant amount of additional retail development here, alongside other uses. The retail centre is very much one of two distinct parts, with a pedestrian shopping precinct and a retail park, separated by a busy main road. The prosperity of both elements is important to the centre performing the strategic role identified. The precinct is clearly going through a difficult period and there is a need for a coherent strategy for the whole centre to be spelt out in some detail.
- 4.94 The Core Strategy identifies the boundary of the centre and the district shopping frontages. Beyond that, and the guidance in Policies CS1 and CS32, I do not believe it is the function of this city-wide plan to spell out in further detail how the vitality and viability of the centre can best be protected

and enhanced and how both parts of the centre can be given the support they need. That level of detail is best developed through the preparation of a masterplan. The Council is committed to preparing such a masterplan for the centre, with all relevant interests. That will take about a year. Notwithstanding that the need is pressing, I do not consider that the Core Strategy is the right vehicle to express views as to the detail as to what type of development should be permitted where, within the boundaries of the centre.

- 4.95 ***Blackbird Leys district centre*** The Blackbird Leys area scores poorly in terms of a range of deprivation measures. It is subject to regeneration measures under Policy CS32. The strategy identifies the centre, for the first time, as a district centre, as part of a co-ordinated approach to improving the facilities and services for local people here. Policy CS3 provides for 3,000 sq m of comparison floorspace and 975 sq m of convenience floorspace. Now the centre does not perform in retail terms as a district centre. The retail offer is very limited, with only 8 unit shops. Clearly, as an aspiration, the approach of the Core Strategy deserves support. However, this begs the question as to whether the approach is likely to prove effective in delivering the desired aims.
- 4.96 It is unlikely that, under current circumstances a 3,000 sq m non-food store would wish to locate here. Land with potential for development is fragmented and there are no sites of the size needed currently available. The key to the growth for the centre is the provision of improved comparison shopping. There is no evidence of a 1,000 sq m, or larger, food store keen to locate here, but the hope of the Council is to attract a number of smaller stores. The Council recognises the need to fundamentally change perceptions of this area and points to the range of investment and initiatives being carried out and planned for this area.
- 4.97 Blackbird Leys centre acts as a centre for many other facilities and services. In practice, it functions as a district centre except for retailing. The SOSDA may have some potential to support some of the community facilities in Blackbird Leys centre, though I doubt that it would provide a strong impetus to an improvement of shopping facilities here, as it is likely to be fairly self-sufficient at this level of community provision.
- 4.98 That said, the regeneration of the area is an important element of the strategy. The role of the centre is inextricably tied up with regeneration; partly dependent on the success of the other measures to improve the area and contributing to the overall success of the regeneration process. In these circumstances, the strategy deserves a chance to prove itself effective. To do otherwise could be seen to undermine the wider efforts to regenerate the area.
- 4.99 Oxford Retail Park does not act as a centre, beyond its retail function. It is an out-of-centre retail park heavily dependent upon access by car. It does not represent a sustainable alternative to the Core Strategy approach to Blackbird Leys centre. Its identification as a district centre would run fundamentally contrary to PPS6 guidance and to the efforts to upgrade Blackbird Leys centre.

Transport planning – Policies CS14 and CS15

- 4.100 Oxford has a long history of very productive joint working between the City and the Highway Authority (the County Council). It has one of the most developed systems of park-and-ride and bus services across the country and has successfully controlled the level of private vehicles within the city centre. Policy CS1 aims to direct development to the most sustainable locations. Policies CS14 & CS15 build on what has been achieved. The latter policy reflects the Highway Authority's thinking, and the emerging 3rd Local Transport Plan (LTP). It is intended to bring forward further measures to try and reduce the need to travel and provide an alternative to the motor car. As the Highway Authority indicates, there is a wealth of evidence that the objectives of the plan will be achieved.
- 4.101 As well as a number of specific improvements to road, rail and buses that are being discussed (CD5/10), significant investment is proposed through the Access to Oxford (ATO) programme. Many of Oxford's accessibility problems relate to its role within the wider sub-region and dealing with these relies heavily on this programme. This is aimed at providing significant action to tackle the existing overloaded road network around Oxford and accommodate growth in the sub-region.
- 4.102 ATO has been identified as a priority by the Regional Transport Board and has been allocated £62 million of the Regional Funding Allocation for 2013-2016 (CD10/7), part of a larger provisional budget identified for implementing the study. The DfT has yet to approve a Business Case. This requires a rigorous approach and will not be completed until early 2010. Notification of a successful bid will not be received until the summer of 2011. Only at that stage can the Highway Authority proceed to detailed planning with any confidence. Until that is received, there can be no certainty of delivery and the achievement of works to help tackle any proposed growth in the sub-region. Without these works, any proposed growth in the sub-region will contribute to worsening traffic congestion.
- 4.103 All strategic planning and economic indicators lead to the very strong expectation that Oxford will continue to grow. In turn, there must be some expectation that infrastructure funding will be forthcoming to support this. The County Council is confident that funding will be forthcoming.
- 4.104 Whilst there can be no guarantee of funding of the ATO programme, there must be a reasonable expectation that funds will be forthcoming. At this stage, it is entirely appropriate to plan on the basis that they will be. I see no conflict with the guidance on infrastructure in that section of PPS12. Should funds not be forthcoming, there may be other measures that could be taken to lessen the impact of growth on current levels of congestion. However, there is no planned-for fall-back scenario in the plan. In an ideal world there should be. Notwithstanding this, at the current time there must be a reasonable prospect that necessary funds will be made available and that the CS should proceed on this basis.
- 4.105 The ATO programme, together with monies through the LTP, the Growth Point funding and Section 106 agreements, should ensure that the aims of the strategy are achieved. The Highway Authority's specific concerns about the ability of the road network to cope with the Northern Gateway strategic development are considered later in this report.

4.106 Both Policies CS14 & CS15 are expressed in general terms and more specificity would be welcome, including a fuller explanation of what is planned and the setting of specific targets for such things as promoting and improving access for pedestrians, cyclists and public transport users, particularly within the city centre, and the integration of the strategic areas within the city through improved transport links. Some of this will be available from the emerging LTP. The omission of some “flesh on the bones” from the Core Strategy is a weakness, but not one that goes to the overall soundness of the plan. The changes proposed to the Monitoring framework go a considerable way to meeting these concerns.

The built environment – Policy CS19

4.107 The Revised Submission Plan introduces changes which highlight the exceptional quality of the city’s built and historic environment through the early sections of the document. However, the single policy on this issue appears only to be lukewarm in its approach to this major asset. Policy BE6 of the RSS talks of protecting, conserving and enhancing the historic environment. It is somewhat surprising that this Core Strategy refers only to the respecting of the historic environment. Oxford deserves more robust policies than this. Having regard to the importance of Oxford’s historic environment and the guidance in the current and emerging PPS15 and the RSS, I propose to strengthen the wording of the policy on the lines promoted by English Heritage, in order to secure conformity with this guidance and to make the plan sound in this respect.

4.108 The supporting text to the policy indicates that a Heritage Plan will be drawn up for the city to provide a strategic basis for decision-making and delivery of initiatives, which is targeted in the monitoring section as being for completion by 2015. Again, and having regard to national guidance, I express some surprise that there is not one in place already and that it would take a further 6 years to complete one. The Council proposes some additions to the implementation section setting out the elements of the proposed Heritage Plan and their target dates. I support this commitment, as recognition of the importance of the city’s heritage. These additions bring the strategy into line with national guidance. It is not for me to determine whether the Heritage Plan should be in the form of a DPD or supplementary guidance. That is properly a matter for the Council.

4.109 In order to make the Core Strategy sound, the following changes should be made:

- i) The deletion of the second part of Policy CS19 and its replacement by: “Development proposals should respect and draw inspiration from Oxford’s unique historic environment (above and below ground), responding positively to the character and distinctiveness of the locality. Development must not result in loss or damage to important historic features, or their settings, particularly those of national importance and, where appropriate, should include proposals for enhancement of the historic environment, particularly where these address local issues identified in, for example, conservation area character appraisal or management plans.**

**Views of the skyline of the historic centre will be protected.”
and**

- ii) **The addition of the following to the Implementation section 9.1, Policy CS19, column 3, after “Proposed Oxford Heritage Plan (City Council)”:**
“comprising
Urban archaeology strategy 2010
Historic Landscape Characterisation 2010
Published list of locally valued buildings 2010
Public Realm strategy complete by 2010
Guidance on skyline, setting and views of Oxford by 2011
Conservation area appraisals by 2013
Overall heritage monitoring strategy by 2015
West End Conservation Management Plan by 2010”

The second part of this recommendation has been incorporated into the latest version of the Core Strategy, as set out in the Combined Changes to the Submission Document (CD1/5).

The Natural Environment – Policy CS13

4.110 Policy CS13 draws a clear distinction between the different levels of the hierarchy of protected habitats, reflecting the guidance in PPS9. The policy goes not permit losses of sites or species of value and goes on to indicate that, where there is an opportunity, development will be expected to enhance Oxford's biodiversity. There does not seem to me the need to repeat the expectation of enhancement, or net gain, across the subsequent types of sites covered in the next paragraph. The Core Strategy provides a clear strategic approach for the city.

4.111 The Council advises that subsequent work on the Development Management DPD will develop the Council's approach to its designated sites and opportunities for their enhancement. It intends to develop a green infrastructure network, linking existing green areas. The Local Plan Wildlife Corridor Policy, NE20, continues to apply and will be updated through the continuing work, as recognised in the latter part of the policy. The Proposals Map will continue to make reference to all nature conservation designations, including wildlife corridors, which will be further developed in the new DPD. It is not for this document to identify any further sites worthy of protection. I have considered the impact of the plan on the Oxford Meadows SAC earlier in my report. I conclude that Policy CS13 is sound.

The provision of infrastructure

4.112 Policy CS18 and Section 9.1 of the plan, on Implementation, have both been substantially redrafted in the Revised Submission Plan to give more detail as to what outputs are being sought, the key providers and how these will be delivered, and how they will be funded. This is a distinct improvement on the original, but both the policy and the supporting section remain very general in nature. Appendix 1 to the Council's statement (CD16/32) draws together a number of the schemes from across the plan and sets out for these schemes the phasing, lead delivery agency, funding source, the CS policy and indicative cost. In hindsight, the Council accepted that this

schedule could and should have been included in the plan. I agree that this is appropriate and would go a long way to meeting the guidance on infrastructure in paragraphs 4.8-4.12 of PPS12. I recommend accordingly.

4.113 Infrastructure provision should be a key element in the judgement of the effectiveness of the provision of the strategic sites. There needs to be a very clear explanation of what key infrastructure has to be provided and also that there is a reasonable prospect of provision (paragraph 4.11 PPS12). The plan needs to be clear as to what infrastructure is necessary to achieve sustainable development, to mitigate any problems and to ensure that this would be effective. This includes physical projects such as bridges, but should also include supporting services and facilities. The coverage of infrastructure provision for the strategic sites is partial only. Although there has been a lot of work done on this, and discussions between the relevant stakeholders, this has not always translated itself into specific information in the plan. In some respects, the details of what will be necessary will only be forthcoming at more detailed master-planning stage. Where it has been possible to define certain infrastructure needs these should be set out in section 9 of the plan.

4.114 ***Developer contributions*** Policy CS18 indicates that developer contributions will be sought where needs arise as a result of new development. It goes on state that contributions will be used to mitigate the adverse effects of development. That reflects the approach of Circular 05/2005, Planning Obligations. There is no need to repeat Circular guidance. Viability considerations are allowed for in the Planning Obligations SPD (CD7/12) which develops the principles set out in the Core Strategy.

4.115 The key service improvements required to support development are listed and cross-referenced, inter alia, to Policy CS20, Community Safety. The provision of 8,000 new homes, some on the strategic sites, will create a demand for additional police resources. Public safety and crime prevention are important features of both national and regional guidance. The police are one of the key service providers. Because the additional demands of new development are likely to create the need for capital funding for the police service, this should be recognised in the plan. Accordingly, I recommend some wording to draw attention to the requirements of the police service.

4.116 Policy CC8 of the RSS promotes planning for green infrastructure. Policy CS18 does provide for green infrastructure to be put in place, but does not go into any further detail. I share the Council’s view that it is not necessary or appropriate in this Core Strategy infrastructure policy to go into such details, as to how and what a green infrastructure strategy would look like, nor to cross-reference to biodiversity enhancement. Policy CS13 considers biodiversity issues. The Council has indicated that it will be looking further at green infrastructure issues, outside of the Core Strategy.

4.117 In order to make the Core Strategy sound, the following changes should be made:

- i) Adding the schedule attached as Appendix 1 to the Council’s statement CD16/32 relating to Implementation to Section 9 of the plan,**
- ii) Changing the fourth bullet point to the key service and site-specific infrastructure improvements in Policy CS18, to read:**

“Local community infrastructure, including police services, in accordance with policies CS20 and CS21.”

- iii) **Changing the wording in the second bullet point in the second paragraph of section 3.5 to read: “service infrastructure: needed to meet the day-to-day needs of the population (for example, schools, policing, affordable housing, community facilities, open space etc);”**

Strategic sites

West End - Policy CS5

- 4.118 Unusually, but for sound reasons, the Council has adopted an Area Action Plan (AAP) (CD7/5) for this area in advance of the Core Strategy. There is, thus, little that can and needs to be said about this area in the Core Strategy. The West End is appropriately identified as a key location and forms an essential part of the Council's strategy. There are, however, two areas where circumstances have moved on since the AAP was examined and adopted: education provision and flooding. This is not a question of over-riding parts of the AAP, but, rather, of updating the position where new information has come forward and the circumstances are therefore changed. The AAP will continue to be the plan to offer site-specific guidance.
- 4.119 The AAP refers briefly to education, saying that work is continuing so as to establish the level of need in the area. The County Council indicated that even at that time research indicated a need for 200 spaces. Options were identified at AAP time, but any choices have diminished, such that there is no choice other than a new school, that can either be provided within West End or some distance away. This is a key issue, a major infrastructure project that ought to be referenced in the Core Strategy.
- 4.120 The County Council, the Education Authority, and the Council both recognise the appropriateness of adding some wording about a possible new school, though they cannot agree the precise wording. The County indicates that, in practice, a decision has been made to pursue a new primary school in the West End, that a joint city/SEEDA/County Statement of Intent to achieve a new school in the West End has been made and all that remains to be done is to establish how that will be achieved. The Council on the other hand states that the decision to provide a new school physically within the West End has yet to be taken. It seems to me that no absolutely final decision has been made to provide a new school within the West End, though that appears to be the likely outcome. In order to provide the most up-to-date information on this important piece of infrastructure, I propose some wording which recognises the need for a new primary school in the West End and how it can be provided.
- 4.121 The West End AAP recognises that parts of the area are subject to flood risk, with Policy WE14 requiring Flood Risk Assessments for certain areas. It is clear that the developments in the West End pass both the sequential and exceptions tests. At the time of that examination, the SFRA (CD14/25) was not complete and the issue of safe access to sites was not specifically addressed. The Environment Agency now raises the issue of dry routes to allow freedom of movement during flood times, an issue which if not addressed could otherwise inhibit the development of some of the sites. It considers that for

the issue to be addressed, there does need to be a Flood Risk Management Plan (FRMP) to show what measures and how this can be addressed.

- 4.122 I agree that it will be necessary to address this issue through a FRMP, as the achievement of safe access routes requires a wider perspective than can be achieved through site-by-site consideration. The Council intends to carry out some major reconstruction of the public realm, which should open up various possible ways of providing safe access. I have no reason to believe that it should not be possible to draw up a practical management scheme to resolve this problem. The Practice Guide to PPS25 does not totally preclude development without safe access in exceptional circumstances. It is not an absolute requirement. For these reasons and in the unusual circumstances of this concern being raised at this late stage, I am of the view that it is not necessary or appropriate for this Core Strategy to be delayed pending that work. I propose to add some wording to the Core Strategy to refer to the need for a FRMP.
- 4.123 The revised text adds a reference to a Conservation Management Plan, as part of its proposed Development Management DPD, flagging up the intention to prepare one. That intention cannot be surprising for such an area and I see no difficulty in retaining the reference in the plan.
- 4.124 **In order to make the Core Strategy sound, the following changes should be made:**
- i) **The addition of the following to the penultimate paragraph of the supporting text: "The West End partnership has a vision for a primary school at the heart of the West End community. This will require a suitable site and full funding. The partnership will seek to achieve this, with funding in the first place through developer contributions and through other appropriate sources."**
 - ii) **The addition of a new bullet point in Policy CS5 to read: "A new 1-form entry Primary School to serve the area."**
 - iii) **The addition of a new bullet point in the key outputs to read: "A new 1-form entry Primary School to serve the area." and**
 - iv) **The addition of the following wording to the supporting text: "A Flood Risk Management Plan will be prepared to ensure that an appropriate level of safe access is provided in the area during times of flood."**

Northern Gateway – Policy CS6

- 4.125 *Consultations* Considerable disquiet has been expressed about the involvement, or lack of it, of the general public in the development of these proposals. As I have reported earlier, I consider the Council has met its general obligations in terms of the Statement of Community Involvement. More specifically, in terms of Northern Gateway, in addition to the original questionnaire sent to all households and all the other forms of consultation referred to in Section 3 above, the Council hand-delivered leaflets to 256 addresses near to the site at the preferred option stage, when Northern Gateway was being promoted for development. In my opinion, the Council took all reasonable steps to notify the public of the plan and its proposals.

- 4.126 In response to the concerns expressed, I opened the hearings up to local people through the involvement of “Engage”. I have also allowed individuals to participate both orally and in writing in the hearings process. I am acutely aware of the feelings expressed by local people as to the adequacy of communication between residents and the Council and on the merits of the proposal (through the representations I have received and through the reports of the public meetings arranged in the area by Engage). I am sure that both the Council and the developers will use all their best endeavours to involve and keep informed the public during the master-planning work to be undertaken as part of the AAP process.
- 4.127 *The proposals* Policy CS6 identifies land at Northern Gateway as a strategic location for an employment-led development, with between 55,000 and 80,000 sq m of Class B-related activities, together with other complementary uses. The developers confirmed that this was still the case, though suggested that the residential component could rise to up to 500 dwellings and the retail to 3,500 sq m. Assuming that an overall acceptable scheme can be prepared, I would see no objection to some minor revisions to figures. However, this is essentially an employment-led development, and should remain so unless there is an overwhelming case to do otherwise. At this stage, I have no such justification. The 80,000 sq m figure of offices is a ceiling figure. The developers believe the scheme would still be deliverable at the lower figure. I make no comment on the suitability of this area for emergency services – that is an operational decision for them to make.
- 4.128 The developers suggest that between 3,000-4,000 new jobs would be created in the new offices, with about a further 100-200 in the other uses proposed. This tallies with the revised Table (CD16/55), which gives a mid-point figure of 3,610 jobs in the Class B sector, with a further 145 in retail, tourism and health, for the Summertown district. The developers have applied a worker density of 18.3 sq m net per office worker, (which equates to about 21 sq m gross) a figure derived from the RSS Supplementary Guidance: Employment Land Reviews (CD10/12); the figure being the South East average floor space per worker for offices; and reflects that at the Oxford Business Park and their own experience of running a significant number of other Business Parks.
- 4.129 Other, much higher, job densities were suggested at the hearing as being more realistic. A knowledge-based development seems to me to be much more likely to have lower density of workers than a more traditional type of office. In any event, in the absence of any convincing alternative to the RSS figure, it seems reasonable to use that as a basis for calculating the potential number of jobs created; both to assess the impact upon the homes/jobs balance and to base potential traffic generation from the development.
- 4.130 *Homes/jobs balance* As regards the homes/jobs balance, which I consider in more detail earlier in my report, the Northern Gateway project is not programmed to start before 2013, with first delivery of jobs in 2014, with a completion only at the end of the plan period. Its impact, therefore, will essentially be on the latter part of the plan period. By that time, much of the housing provision will have been made. Given my overall conclusions on the balance, the timing of this proposal is such that there would not be a short-term worsening of the balance. The achievement of the 7,500 pro rata figure for jobs, (derived from the RSS’s 18,000 jobs by 2016), will be

dependent upon other committed and pipeline sites. This site does not materially contribute to that achievement. Even with Northern Gateway, a material improvement in the homes/jobs ratio should be achievable by 2026.

- 4.131 *Provision of employment* I have concluded in an earlier section above that there is a need to provide a significant amount of additional employment land in Oxford during the plan period. If the Core Strategy is to provide the employment land needed for Oxford to perform the role required of it, then this is the only realistic opportunity. Of the other strategic sites, Barton is rather isolated, and better suited to housing development; Summertown is not readily available and, again, is physically more suited to a housing development; the West End, subject of a very recent AAP, which identifies it for a mixed range of uses suited to a city centre location, does not have the capacity to deliver this amount, or quality, of additional employment development. The SOSDA provides for a housing-led urban extension. No decision has yet been taken as to the exact mix of land uses, but a major employment development there would run counter to the reasons the RSS supported the proposal.
- 4.132 The land lies to the northern edge of the built-up area of Oxford. Obviously, a more central location, in the city centre, would be more sustainable. However, that is not an option. This is the only realistic site within the boundaries of Oxford. I have considered earlier in my report that development of the Northern Gateway area would make an important contribution to the wider role of the Central Oxfordshire sub-region and should not prejudice other proposals in the towns outside Oxford. Paragraph 22.9 of the RSS indicates that land should not be released for employment to the north of Oxford that could adversely affect the future buoyancy of other towns. That paragraph draws attention to the potential of the land at Peartree. It then goes on to refer to land to the north of Oxford. Reading that section of the RSS as a whole, it is my interpretation that this stricture does not apply to this site lying, as it does, within the city boundary.
- 4.133 I do not have a detailed sub-regional study that could throw more light on the relationship between Oxford and its sub-region or consider on a comparative basis other potential options, if any, beyond the city boundary. In the context of the need for the city to achieve further growth to fulfil its role, the Northern Gateway employment-led development deserves strong support.
- 4.134 *Sustainability of the location* Its location adjoining the A34 and on the edge of the city does, however, raise sustainability issues in relation to both national and more local guidance. PPG13 promotes sustainable locations for development and the reduction in the need to travel and cautions against schemes that have a dependency on the car. At paragraph 20 it indicates that major generators of travel demand should be focussed on centres and near to major public transport interchanges. Out-of-town interchanges should not be a focus for land uses that are major generators of travel demand. This is a major generator of the need to travel. Being an out-of-centre development, close to a major road junction, it potentially conflicts with the national guidance. That, however, has to be seen in the context of Oxford being a relatively compact city, with a good level of public transport. It is not in a remote location, isolated from its surroundings. It lies within the strong boundary provided by the A34 on this edge of the city.

- 4.135 The Northern Gateway strategic area is centred upon an area of safeguarded land. It is the only site, of any significant size, available for employment development. It has been identified for some years for possible long-term development. Ideally, development of this nature and scale should be located within the city centre, but that is not possible, nor are there better alternative locations for this development. Sequentially, it is the only potential site. Provision of a significant housing element would help to improve the sustainability of the site. Judgements, therefore, fall to be made on the overall merits of the proposals, weighing up the benefits of the provision of significant employment opportunities against the locational/site disbenefits.
- 4.136 The Northern Gateway area has the benefit of being reasonably close to both the Universities and major health facilities. It is intended that the nature of the development be closely related to the work of these institutions and this physical proximity is an advantage. Much of the employment land in the city is disproportionately concentrated within the southern parts. Providing a major employment development at the northern edge would go some way to provide a better geographical balance between homes and jobs across the city. This, in time, could lead to a more sustainable pattern of movement within the city, building on the existing high levels of containment, though I have no direct evidence to confirm this possibility. Being on the northern edge, it is still likely that a significant amount of journeys will be generated from outside the city. That would have to be addressed by both physical and non-physical measures.
- 4.137 *Highways and traffic* Northern Gateway lies at the focus of 3 extremely busy main roads, the A34 trunk road, the A40 and A44; all of which suffer from very high levels of traffic; the most congested area in Oxfordshire and one of the most stressed parts of the road network in the whole South East, with well documented very real problems of congestion (CD5/11). The roundabouts at Wolvercote and Cutteslowe are heavily overloaded. To be acceptable, any development must show that the site can be developed in a sustainable manner, with priority given to non-car modes of access, and that the nearby road system can accommodate any additional traffic in an acceptable manner.
- 4.138 As matters stand at the moment, there appears little doubt that the existing main road network could not accommodate any additional traffic generated here without very severe increases in congestion. There is a package of measures being promoted, the Access to Oxford (ATO), which seeks to address some of the problems being experienced. As I have concluded earlier, there is a reasonable prospect of these measures being achieved. Those measures, though, are not directly geared to resolving traffic issues arising from the development of this site, they are directed to responding to the existing problems and that arising from general growth in traffic levels. Clearly, further measures would be needed, over and above the ATO measures, if the Northern Gateway development were to proceed without unacceptable impact on traffic in the area.
- 4.139 Very little detailed work has yet been carried out to assess the likely generation of movements, the split between car and non-car modes and its distribution across the road network. There are still a great number of unknowns. It is the Council's intention to consider these as part of the

preparation of the Northern Gateway AAP. I am not in the position to say categorically that this development could or could not be accommodated satisfactorily and provide a sustainable form of development, meeting both national and more local guidance. I do however need to come to a view on whether there is a realistic prospect of an acceptable scheme being developed, that would serve to demonstrate that the proposals could deliver the necessary levels of development.

- 4.140 The figures on traffic generation, modal split and trip distribution provided by the developers and discussed at the hearings (CD15/16) had not been widely circulated, but on the basis of the discussion, it seems to me that they provide a useful first pointer as to what might be achievable. The levels of additional movements are significant, given the scale of the development. Policy CS14 of the Core Strategy also requires development to prioritise means of travel other than the car. There are a number of ways that non-car use could be stimulated and car use restrained. The figures aspire to a very optimistic level of non-car use, applying city-wide patterns. This is not a typical city site, being on the edge of the city, albeit only about 4.5km from the station. As the 2001 Census shows, Oxford achieves a high proportion of bus and cycle/pedestrian movements within the city. A large number of bus routes serve this general area. Nevertheless, the city-wide pattern of movements would not be replicated here without very strong action being taken. Indeed, a large majority of trips into the city from outside continue to be made by car.
- 4.141 That said, I do not, on the other hand, consider that the figures for modal split at the Oxford Business Park represent a more realistic picture. That scheme was developed in a different context, with different imperatives. The imperative here would very much be to reduce car usage to an absolute minimum. There are ways in which this might be done, including the interception and transfer of car borne commuters heading into the city in the am peak, and leaving in the pm peak, to buses. Oxford has a good track record on public transport and has a well-developed bus system. That could be developed further to respond to the needs of the development, including links to the station, other parts of the city centre and other areas around the city. The possible station at Water Eaton, although described as a "Parkway" station, offers some prospect of developing access by train, possibly linked by a shuttle bus, to this area, albeit the potential may be limited.
- 4.142 Further, the development of a robust Travel Plan, exploiting all the possible ways of encouraging non-car usage would be necessary. Travel plans are becoming more sophisticated and are increasingly recognised as an essential feature and deliverable feature for proposals of this nature. Limitations on car parking on site would also assist, though this is made more complicated by the availability of a Park-and-Ride site immediately adjoining and unrestricted residential streets nearby. Any scheme to limit car parking on site would need also to take these matters into account and produce a workable, coherent strategy for the wider area.
- 4.143 Even if the type of modal split shown in the developers' figures was achievable, the development would still add considerable levels of traffic onto crowded roads. Further physical measures, beyond those carried out under the ATO package, would be needed to assimilate this traffic without causing severe harm and to give priority to non-car users. I have no evidence that

this could be done, though suggestions were made as to the type of works that potentially could be carried out here. The development could provide the critical mass to also support significant new levels of investment in public transport here. Land within the Northern Gateway area could help to contribute to any revisions to the roads and junctions. It may be possible to align the ATO package with measures related to this development to produce a comprehensive, co-ordinated package. There is, however, a long way to go before a clear judgement could be made on this.

- 4.144 Suffice it to say, the developers are fully aware of the scale of action that would be needed to put in place a package of measures to satisfy the Highways Agency, the Highways Authority and the City Council as to their concerns. I consider the evidence base is sound, as far as it goes. I also consider that there is a reasonable prospect of them being able to achieve an acceptable scheme, though I do not doubt the height of the hurdles that would need to be cleared before this could be done. There is no absolute show-stopper here. The plan gives a range of scale of development and it may well be that an acceptable scheme could only be achieved at the lower end of the scale suggested by the policy. That is for other work to demonstrate.
- 4.145 *Character and setting* As an area of open land, the fields here contribute to the setting and character of this part of Oxford. However, I do not consider that this land is of such importance as to merit its retention as open space, given the severe shortage of land within the city boundary and the strong need underlying the development. It is dominated by the presence of the main roads. It is not open countryside. Its contribution to the physical separation of Oxford from Kidlington to the north is limited. The A34 forms a more substantial barrier to the physical expansion of the city. I find no convincing reason from a visual point of view to leave this land open.
- 4.146 *Green Belt land* Although the central part of the area has been recognised as available for development, an indicative boundary for the AAP includes other land, including two parcels of Green Belt land. The definition of an indicative boundary helps to remove any uncertainty, allaying fears that the development could include some residential properties. For this reason, the indicative boundary of the AAP should replace the star shown on the Proposals Map.
- 4.147 The inclusion of the Green Belt land within the indicative boundary does not mean that exceptional circumstances necessarily exist to remove that land from the Green Belt. The exceptional circumstances referred to in paragraph 22.18 of the RSS relate to the circumstances of the urban extension to the city. Some of those reasons could be taken to apply equally to this development. In the context of a major strategic development focussed on the safeguarded land within the last major opportunity for development, it would be sensible and logical to allow for the consideration of all the options, in order to prepare a coherent and comprehensive masterplan for this unique opportunity; making the most effective and efficient use of the land here. It will be for the AAP master-planning exercise to examine in detail the merits and justification of including the Green Belt land and, through the identification of specific proposals, provide the exceptional circumstances to justify the inclusion of any Green Belt areas within the development site.

- 4.148 *Habitat impact* None of the land within the indicative boundary has intrinsic ecological merits that would prevent development being considered here (CDs 14/23 and 14/26). Natural England has indicated that it is satisfied that the HRA shows that some development could go ahead without an adverse effect on integrity of the Oxford Meadows SAC, but an adverse effect on integrity from the proposed levels in the strategic allocations cannot be ruled out at this stage. It is seeking a strengthening of the Core Strategy to make specific reference to the issues to be addressed at the AAP stage and the Council's commitment not to pursue an option that would give rise to significant impacts on the SAC that could not be fully mitigated. That reflects the detailed studies undertaken (CD15/13 to 15/15) and I recommend the wording be added to the policy, which cover issues of water hydrology and air quality. I have no reason to believe that hydrology and air quality issues are insurmountable, but they will need to be addressed firmly in any master-planning work that is carried out.
- 4.149 *Other impacts* Relatively few residents directly adjoin the development land. Steps would be needed to ensure that their interests were not unacceptably affected. Of wider concern is the issue of any resultant impact on the rat-running through unsuitable roads in the area. The traffic work would also need to give due consideration to this issue. Part of the indicative area is within a Conservation Area. That does not preclude development, but means that development there would have to preserve or enhance the character or appearance of the area.
- 4.150 *Conclusions* In conclusion on Northern Gateway, I consider that there are very strong reasons to support, in principle, an employment-led strategic development in this area. The developers are very confident of their ability to deliver an acceptable scheme. I do not underestimate the hurdles that will need to be jumped if an acceptable development is to be achieved. Only further, detailed master-planning, through the AAP, will be able to demonstrate whether an acceptable development can be achieved in practice and what form/scale it could be, together with possible mitigation measures. In the meantime, I conclude that there is a reasonable prospect of this being achieved and given the convincing reasons in support of development here, I believe these strategic proposals should continue to form a central plank of the Council's strategy.
- 4.151 The Core Strategy contains no contingency should the Northern Gateway proposal not proceed. That is understandable given the lack of options to accommodate development. The Northern Gateway project is a fundamental part of the strategy. Without it, a significant part of the strategy, in terms of the economy and wealth creation, would be undermined, although many other elements would still be relevant. In the event of the Northern Gateway proposals not proceeding, the Council would have little choice but to carry out an early review of the Core Strategy.
- 4.152 Given that work on site would not be likely to commence before 2013, with delivery mostly in the second half of the plan period, I see no need to phase the development. The relationship with any necessary infrastructure, such as envisaged in the ATO package can best be considered in the forthcoming AAP. Nor do I see a need to limit the size of the development at this stage.

The AAP will consider the detailed impact and mitigation measures, which will have the effect of setting a ceiling to the scale of the development.

4.153 In order to properly reflect national and local guidance, the policy needs to address more directly the issues of impact upon the SAC and the traffic and highways. To that end, I recommend some wording to be added to the wording of Policy CS6.

4.154 In order to make the Core Strategy sound, the following changes should be made:

- i) The addition of the following to Policy CS6: “Development is dependent upon the securing of measures designed to mitigate the impact on the local and strategic road networks, acceptable to both the Highways Agency and Highways Authority. The mitigation measures must be implemented in accordance with the agreed phasing, with full implementation prior to the occupation of the final development phase.” and**
- ii) The addition to the policy of the wording in paragraph 3.1 of the additional statement by Natural England, dated 7 September 2009, reference M8NG/CR28/1.**

Unless the Proposals Map is amended at adoption by the deletion of the star and its replacement by the indicative AAP boundary as shown on Map A, Policy CS6 will be unsound.

Part (ii) of this recommendation has now been incorporated into the latest version of the Core Strategy (CD16/78 -Appendix A2).

Barton – Policy CS7

4.155 This site comprises safeguarded land under Policy NE3 of the Local Plan (CD7/6). It is one of the very few large sites available to meet housing needs. The SHLAA (CD14/1) demonstrates that it is needed to help meet the housing requirements, in years 6-11. Allowing for the retention of the allotments, open space and the exclusion of the floodplain, some 23 hectares remain suitable for development and are capable of providing between 800-1,200 new dwellings. The site is geographically close to the city centre and offers the opportunity to assist in the regeneration of the nearby housing estates.

4.156 It is, however, tightly constrained by physical barriers and to achieve a reasonable integration with the rest of the city, it is essential that a link, or links, is provided across the A40 ring road. Various options have been considered, including a bus bridge. Solutions are technically feasible, but will add a cost to the overall development. Options have been costed, with no fundamental viability problems identified. The Council is in working partnership with the Homes and Communities Agency, who are very supportive of the scheme. A Preliminary Transport Assessment (CD15/12) has concluded that there are no significant transport reasons that would affect the ability to implement this proposal. The development is both justified and likely to be effective.

4.157 The development will require a primary school to be provided. This is an essential element of the necessary infrastructure, which should be specifically recognised within the plan. I recommend some wording to reflect this.

4.158 Consequent to this, and my recommendation on education provision in the West End, some wording revision is needed to section 5.3 of the plan, on education. I recommend accordingly below.

4.159 The Proposals Map indicates the site by a star. The land in question is all safeguarded land which has very clear boundaries: the city boundary; the A40 and the housing area to the east. To avoid uncertainty, the extent of this strategic area can and should be delineated on the Proposals Map. I recommend accordingly below.

4.160 **In order to make the Core Strategy sound, the following changes to Policy CS7 should be made:**

- i) **The deletion of the key output “Primary and itself” and its replacement, as the third output, by: “to deliver a new multi-purpose community building based around a new primary school on site, and access to secondary education.”**
- ii) **The addition of “(including a new primary school)” at the end of the second sentence to the policy, and**
- iii) **The addition of a new bullet point under Delivery and partnership to read: “provide for the timely funding and delivery of the necessary community facilities required to meet the needs of the development.”**

Unless the Proposal Map is amended at adoption by the deletion of the star marking the strategic area and is replaced by the delineation of the site in accordance with Map B, Policy CS7 will be unsound.

I further recommend that in order to make the Core Strategy sound, the following changes be made to section 5.3 of the plan:

- i) **The deletion of the remainder of the paragraph from “In terms of the West End existing schools” and its replacement by: “The West End partnership is committed to achieving a new primary school as the basis of a wide ranging community facility within the area. This will require suitable land and full funding for the school. Regarding land at Barton, the County Council indicate that this site would bring in enough primary school pupils to trigger a need for a new 1.5 or 2 form entry primary school. A new multi-purpose community facility, including a primary school, will be provided as part of the development.” and**
- ii) **The deletion of the second paragraph of Policy CS17 and its replacement by: “The strategic development areas at Barton and West End, and potentially Summertown, will identify suitable provision for primary school(s). Funding to enable the timely provision of the necessary education facilities will be sought from the developments that generate that need.”**

South Oxford Strategic Development Area (SOSDA) – Policy CS8

- 4.161 The RSS provides for an urban extension to the southern edge of the city. This will take place on land outside the city, in South Oxfordshire District. It is not for the Core Strategy to revisit that decision, and indeed, it does not attempt to. The only concern is how this plan should make reference to the SOSDA. The SOSDA, although physically within the adjoining authority, is required to meet the city's housing needs. It is generated by the needs of the city and would form a physical and functional part of the urban area, relating closely to the city and impacting upon it. The Core Strategy reasonably considers the implications for the city.
- 4.162 Some form of joint working will be necessary between the city and South Oxfordshire. The city prefers to take work forward through a joint Area Action Plan, whilst South Oxfordshire intends to prepare an SPD. It seems to me that a formal AAP, allowing for full independent examination, would be the more appropriate method for a scheme as large and important as this. However, that decision is not mine and the authorities will have to consider the best means of developing a master-plan. In the meantime, I see no reason for this plan not to express the city's preference and any aspirations it has. Conversely, it would not be appropriate for the Core Strategy to set out what will happen in the SOSDA, as this has yet to be determined, whatever form of joint working is adopted.
- 4.163 Policy CS8 refers to a mixed-use development and, potentially, additional employment land. The RSS talks of a sustainable urban extension. Any development is likely to include more than simply housing. As well as necessary supporting services and facilities, some employment, even if only at a very local level, is probable, though the level of it has yet to be decided. It is not for this policy to be any more specific and it does not seek to do so. Accordingly, I consider the terms of the policy in this respect are appropriate.
- 4.164 The Core Strategy Key Diagram shows an indicative boundary for the AAP, which incorporates the southern fringes of the city. This is an *indicative* boundary. It does not purport to be an agreed formal boundary. In the City's view, the master-planning will need to look closely at the southern parts of the city to ensure successful integration and to achieve regeneration that is so important to this part of the city. I agree with that. It is too early to give more information as to how this might be achieved. In these circumstances, I consider that the Council is fully justified in showing this indicative area on the Key Diagram.
- 4.165 In conclusion, I consider that the Core Strategy says as much as it can in the circumstances. Of necessity, these are more aspirations than specific indications of what will happen. The city is justified in the approach it is taking and I propose no wording changes in respect of the SOSDA, other than minor changes to bring the Core Strategy into better alignment with the RSS.
- 4.166 In order to make the Core Strategy sound, the following changes be made: The deletion of the words "at least" before references to 4,000 dwellings in the policy and supporting text to Policy CS8 and in section 7.1.**

This recommendation is overtaken by the Council's deletion of all references to the South of Oxford Strategic Development Area in the later Further Proposed Changes (see Part Two of our report)

Land at Summertown – Policy CS9

- 4.167 Policy CS9 identifies land at Summertown for predominantly residential development, the Council identifying the potential here to meet longer-term housing needs. The allocation is not expressed in site-specific terms, the location being marked on the Proposals Map with a star. Land immediately along the Cherwell valley lies within the Green Belt, but there is an area of non-Green Belt land that runs westwards to the Summer Fields School, a large section of which has been designated as safeguarded land in the Local Plan, since 1997. Much of this land is occupied by school and college playing fields.
- 4.168 The location is a sustainable one, close to Summertown district centre. It represents one of the very few non-Green Belt locations within the city with some potential for development. The Core Strategy acknowledges that the site is not available at present, but wishes to flag up the possibility of longer-term housing development here and to protect it from development that would prejudice this potential. It is clear from the evidence presented that this land is not currently available and there is no definite commitment from existing landowners to make it available at any time. Nevertheless, in the context of the very strong development needs in the city and the extremely limited availability for development of non-Green Belt, flagging up the potential of this land for possible development in the long term is justified. The land is part of the Cherwell valley. It has strong tree cover along its western flank. In my view, it should be possible to develop this land without unacceptable impact on the openness and character of the wider valley area.
- 4.169 There would be many hurdles to jump before any land here could be developed, not least the relocation of the existing uses, access, traffic management, school provision, protection of habitats, flood risk and the avoidance of impact upon the Oxford Meadows SAC. The land may not become available and/or these issues may or may not prove insurmountable. However, given the pressure on identifying development land and the high degree of need, I consider the Council is justified in its approach. For the avoidance of doubt and having regard to my conclusions on this issue earlier in my report, specific mention needs to be given to the concerns about the potential impact on the SAC. This need only be brief, to highlight that the issue needs to be considered further.
- 4.170 The Proposals Map shows the area delineated by a star. This is vague and creates uncertainty and should be removed. The location is also shown on the Key Diagram. The core of the land is shown on the Proposals Map as safeguarded land, though there is currently no certainty as to the ultimate extent, should it come forward for development. In these circumstances, I do not consider it would be helpful for the Proposals Map to delineate a precise boundary. The area of safeguarded land needs to be retained and I propose a consequential minor change to the wording of Policy CS2 to this effect, which will also require Local Plan Policy NE.3 to be retained.

4.171 In order to make the Core Strategy sound, the following changes be made:

- i) The addition of the following words to the supporting text to Policy CS9: “To meet the requirements of the Habitat Regulations any masterplan for the area will need to be informed by an Appropriate Assessment of the potential hydrological and air quality impact on the Oxford Meadows SAC.” and**
- ii) The rewording of the third paragraph of Policy CS2 to read: “Land at Northern Gateway and Barton is no longer safeguarded and is re-designated in accordance with policies CS6 and CS7.” As a consequence, Local Plan Policy NE.3 will need to be retained.**

Unless the Proposals Map is amended at adoption by the deletion of the star marking this strategic area, Policy CS9 will be unsound.

Monitoring

4.172 In response to my concerns about the inadequacy of the monitoring section of the plan, the Council has proposed a major rewrite of this section (CD16/58). This introduces much greater detail, with a more comprehensive list of specific targets and timelines, which should enable progress on the strategy to be monitored on a regular basis. Without it, the monitoring of performance and progress and the need for any consequential changes to be made in the strategy would have been difficult. With an inadequate monitoring section the Core Strategy was unsound. The new section rectifies this by providing a more sensitive and inclusive approach. I do not consider that any further changes to the monitoring section are needed to make the plan sound.

4.173 In order to make the Core Strategy sound, the following change be made: The deletion of section 9.2 and its replacement by the new section in CD 16/58.

The changes to the monitoring table have been made in the Combined Changes to Submission document (CD1/5).

5 Overall Conclusions

5.1 I conclude that, with the amendments I recommend, the Oxford Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the “tests of soundness” in PPS12.

David Fenton

INSPECTOR

Inspector Pratt endorses the conclusions and recommendations in this section of the report.

Part two

1. *This section of our report reviews the soundness of the Core Strategy in the light of the Council's Further Proposed Changes (published in April 2010) (CD1/3), addressing the deletion of the SOSDA, as well as the implications of the Secretary of State's announcement in July 2010 about the revocation of the RSS. We also review updated information on housing and employment land supply, along with other key developments and changes in national planning policy since the original hearings closed in September 2009. Finally, we review the situation following the successful High Court challenge on 10 November 2010 to the Secretary of State's revocation of the RSS and its consequent reinstatement as part of the statutory development plan.*

Update on housing and employment land supply

2. Since the close of the original hearing sessions, the Council has updated its Annual Monitoring Report and Strategic Housing Land Availability Assessment (SHLAA;UR1b) (CD7/28). The SHLAA confirms that sufficient sites are available to meet the current 5-year housing requirement (of 400 dwellings/year) established in the RSS. Sites for 1,903 dwellings have been identified to meet a residual requirement of 1,760 dwellings, taking account of completions in earlier years of the plan period.
3. The SHLAA also identifies sufficient sites to meet the first 10-years supply of housing without relying on windfalls. Sites for 4,337 dwellings have been identified to meet a requirement of 4,000 dwellings (2010-2020). For the full 20-year period, the SHLAA identifies sites for 6,352 dwellings, which is some 1,648 dwellings short of the target of 8,000 dwellings, but with the addition of windfalls (at 170 dwellings/year), overall housing provision is estimated at 9,072 dwellings. With an increased number of dwellings at the Northern Gateway site, this could rise to 9,132 dwellings, well over the 8,000 dwelling target. Consequently, this latest information demonstrates that the delivery of new housing is well on course to meet the overall requirement of 8,000 dwellings (2006-2026).
4. The position on employment land supply is little different from when the first hearings closed in September 2009. The Council has not updated its Employment Land Study, but its consultants confirm that the range of options and estimates remain as a reasonable basis for planning Oxford's future employment land needs [CD14/27a]. Although the latest national policy in PPS4 advocates a wider view of economic development (including retail, education and other employment-generating uses), the Council has undertaken separate studies and estimates for these other land uses.
5. The new Government's focus on Local Enterprise Partnerships and rebalancing the economy towards the private sector should not affect the employment evidence base, since it already focuses on the land needs for private sector employment growth. Moreover, safeguarding existing employment land is in line with PPS4 Policy EC2(h). Much is made of the "seismic" shifts in recent economic conditions, but this is a 20-year plan, during which time economic conditions are likely to improve, albeit perhaps more slowly, which should not invalidate the conclusions and estimates included in the Employment Land Study.

6. Employment land in Oxford continues to be made up of existing protected employment sites and a limited supply of new/allocated development sites. This latter category comprises about 62ha of employment land. Oxford Business Park and Oxford Science Park remain as the two main opportunities for further new employment development on existing employment sites. In addition to some speculative vacant office buildings, some 7.9ha of developable employment land remains at Oxford Business Park which, at an average rate of 6,500 m² per year would see this business park completed by 2016. Land remains available at Oxford Science Park, but even with reduced take-up rates due to current economic difficulties, this site is likely to be fully developed by 2020.
7. Current economic conditions would suggest less optimistic forecasts in terms of take-up of new employment land, and specific new developments may alter the mix of employment and other uses. However, economic conditions are expected to improve over the period of this plan, and there will still be a need to provide a range and quality of employment land. All the latest information confirms that further employment land will be needed to meet Oxford's employment needs in the medium-longer term. We deal with the estimates of employment growth and the housing:jobs balance later in this section of our report.

Other developments and events since the close of the original hearings

8. Since the original hearings closed last September, further progress has been made with Chiltern Railways' "Evergreen 3" project, providing a new rail link between Oxford and London Marylebone via Bicester. Further details have become available, including a proposed parkway station at Water Eaton, just over the city boundary in Cherwell DC's area. Traffic modelling is being undertaken and the Transport & Works Act inquiry opened in November 2010. This project will undoubtedly have implications and benefits in terms of Oxford's traffic and transportation strategy. However, since the parkway station lies outside the city boundary, the CS does not need to specifically address this proposal. The traffic and other implications of the proposed Northern Gateway proposal, combined with the parkway station, will be fully considered when further details of this project come forward. Since the CS already refers to the Chiltern Railways' proposal, we do not consider any further amendments are needed to reflect the further progress that has been made on this project.
9. Other events, such as designating Warneford Meadow as a town green and part of Southfield Golf Club as a local wildlife site, are unlikely to have significant consequences for the strategy in the CS. Similarly, recent developments proposed at Oxford Brookes University, Radcliffe Infirmary and West End/Westgate do not undermine the strategy set out in the CS. The new flood plan for Oxford published by the Environment Agency does not affect the underlying strategy, since the CS has been subject to a full SFRA. National and regional funding of specific schemes (such as Access to Oxford) may be more uncertain in the present economic climate, but the relevant authorities/agencies will be looking to find alternative sources of finance where possible. Issues around student accommodation are not new and have already been considered at the previous hearing sessions.

10. In March 2010, new PPS5 was published, setting out the national policy on planning for the historic environment, including heritage assets. The Council has not specifically reviewed the CS in the light of this new national policy, which differs little from the draft policy considered at the previous hearings. The CS and its evidence base does not cover all the elements set out in the new national heritage policy, but there is nothing in Policy CS18 and the accompanying text which is inconsistent with it. In any event, this new national policy will apply in Oxford, and further details of its requirements, including the need for new development management policies, can be considered when the Council draws up its Development Management Policies DPD. We also note that PPS5 (¶ 2) confirms that the preparation of development plans should not be delayed unnecessarily to take into account its new policies. Consequently, we are satisfied that no further amendments are needed to the CS to ensure that the heritage policy is consistent with the latest national policy in PPS5.

Further Proposed Changes

11. In April 2010, the Council published a set of Further Proposed Changes (FPCs) to the CS [CD1/3] and invited representations. These changes essentially deal with the deletion of the South of Oxford Strategic Development Area (SOSDA), originally included in the RSS, but subject to legal challenges. In addition, as a result of reviewing the housing:jobs balance following the deletion of this 4,000 dwelling SOSDA immediately outside the city boundary, amendments were made to the scale and phasing of the proposed Northern Gateway development. The Council has summarised the points made in the representations to the FPCs [CD16/76], and we consider the key issues raised by the FPCs and the representations later in this part of our report. **We recommend that the these FPCs are incorporated into the amended CS, in order for it to be sound.**

Implications of the Secretary of State's announcement about the revocation of the South-East Plan RSS

12. On 6 July 2010, the Secretary of State announced that all Regional Strategies (including the South-East Plan RSS) had been revoked (but see later). As a result, we asked the Council and all representors for their views on the implications of this revocation. The Council has confirmed that when it started work on the CS in early 2006, it adopted a "bottom-up" approach, whereby the spatial strategy emerged from key parts of the evidence base rather than being imposed from above. The Council also confirmed that it did not intend to review the CS following the revocation of the RSS. The housing figures in the RSS have always been considered as a minimum, and the CS was prepared with a view to conforming with, but not duplicating, regional policy in the RSS. The overall strategy for Central Oxfordshire was prepared by the Oxfordshire local authorities, and supported at the EIP, rather than being imposed by a higher authority.
13. The main implication of the revocation of the RSS relates to the deletion of the SOSDA, but the loss of other policies and strategies in the RSS would provide a considerable gap in the regional/sub-regional planning framework which may take some time to rectify. However, since the RSS did not dictate the options that were considered during the preparation of the CS, and did not impose its own strategies, policies or figures, we consider that

the CS can stand on its own, supported by its own independent evidence base. In the meantime, current national policy will apply and the need for more detailed development management policies to address key policy areas lost as a result of the intended revocation of the RSS could be considered when the Development Management Policies DPD is prepared.

14. At the latest hearing sessions, the Council set out some additional changes to the CS to reflect the revocation of the RSS (CD16/78). However, now that the RSS has been reinstated as part of the development plan (see later), it is no longer necessary to make most of these changes, but some minor changes are needed for factual accuracy. **We recommend accordingly.**

Housing land provision

15. The Council has confirmed that it intends to retain the existing CS target of 8,000 dwellings (2006-2026) originally established in the RSS. This is based on an assessment of capacity, which shows that this figure is both realistic and deliverable. It is also a minimum target, which the Council aims to meet and will probably exceed. Furthermore, this figure will not meet the actual housing need from within Oxford City, which is much higher, hence the previous allocation in the RSS of 4,000 dwellings in the SOSDA. The Council has summarised the reasoning behind its decision to retain the housing provision figure of 8,000 dwellings, referring to documents and evidence used when preparing the RSS [CD16/73].
16. In essence, the original housing figures in the RSS were provided by the Oxfordshire local authorities, based on evidence about the potential for housing within the urban area and on safeguarded land in Oxford in 2005. These figures were reviewed by SEERA and, at the RSS EIP, Oxford City Council argued for a slightly higher annual figure for the Central Oxfordshire sub-region, resulting in the EIP Panel's recommendation (accepted by the Secretary of State) for 8,000 dwellings for Oxford city, as well as the 4,000 dwellings allocated to the SOSDA. Furthermore, in preparing the CS, the Council tested a range of options for housing provision between 7,000-11,000 dwellings, before concluding that 8,000 was the most appropriate target. We consider this figure has a sound basis, was fully justified at the time of the EIP into the RSS, was not imposed by a higher authority, and is supported in the evidence base accompanying the CS.
17. Recent population and household projections confirm a relatively high housing need for Oxford city, well exceeding current supply and targets. The latest OCC projections show the city's population growing from 140,690 in 2006 to 156,600 in 2026, an increase of nearly 16,000 or almost 800 people per year. Even the most optimistic projections in the SHMA show a shortfall of almost 20,000 dwellings between 2006-2016, well in excess of the 8,000 target for new dwellings over the entire plan period. The latest SHLAA also estimates a potential capacity of just over 9,000 new dwellings (2006-2026), taking a cautious approach to land availability during the current economic climate.
18. Given the particular development constraints of Oxford, including Green Belt, flood plain, heritage and nature conservation, land availability is the key restraining factor. We consider that 8,000 dwellings represents an appropriate and justified housing capacity target, balanced against

environmental and other constraints. There is certainly no robust case to consider a lower housing provision figure, and higher figures could be unrealistic and undeliverable. Further work will be needed at sub-regional level to address the loss of 4,000 dwellings originally planned for the SOSDA, but this is outside the scope of the current CS. Consequently, we consider the 8,000 dwelling target remains appropriate, realistic, deliverable and soundly-based.

19. We also asked for views on other recent ministerial statements revising national policy on the status of residential gardens as previously developed land and the removal of the minimum density requirement in PPS3. We understand that the SHLAA does not include small sites on garden land within its assessment of land availability; a few larger sites might be affected by the change in national policy, but this would not affect many dwellings. Most garden land development would fall within the definition of windfalls, which are only included in the estimates for housing land supply in later years of the plan. In the meantime, planning applications for the development of residential gardens will be considered on their own merits without the benefit of being designated as previously developed land. As for density, development in Oxford city is likely to be higher than the previous national level (30 dw/ha), as shown in the existing Local Plan policy and Balance of Dwellings SPD. Consequently, we believe that these recent amendments to national policy would not have a significant effect on the future delivery of housing land within the plan period.

Employment land strategy

20. The Council has confirmed that it intends to retain the overall employment strategy in the CS, including the level of proposed employment land. The main evidence base for this strategy and land provision is set out in the Employment Land Study [CD14/27], which supports a “managed economic growth” strategy to land provision, protecting and modernising existing employment land, as well as providing new employment land in the West End and at the Northern Gateway. This study forecasted land needs over a 15-year period, which would be expected to cover a variety of economic cycles, including periods of downturn and growth.
21. Although some say there has been a “seismic shift” in economic conditions since the study was undertaken, the Council’s consultants confirm that its conclusions remain valid. More recent research confirms that growth should be focused on private sector jobs, and also confirms Oxford’s role as a buoyant city which could support some economic and employment growth. Economic growth is also at the heart of the latest national policy guidance in PPS4, and Local Economic Partnerships have a key role in addressing the need to rebalance the economy towards the private sector. The Council’s Local investment Plan will also support the local economy, including regeneration and the provision of infrastructure.
22. As with the housing strategy, the economic role and employment strategy for Oxford was established through a “bottom-up” approach which fed into the RSS, rather than being imposed from above. Oxford city clearly has a key role to play in the sub-regional economy, building on its particular strengths and advantages, particularly in the science-based and research economy. This role is consistent with the latest national guidance in PPS4.

Although some argue for a complete review of the economic strategy for Oxford, we consider the CS can stand on its own, with or without the RSS, and is supported by its own evidence base.

23. Looking forward to 2026, there is clear need to avoid constraining economic growth if Oxford city is to build itself out of the current recession. Enough land needs to be readily available to meet the needs of indigenous and incoming businesses and re-focus the economy towards the private sector. Although other land and buildings may become available for employment uses, Oxford needs to have a portfolio of suitable and available land, not only in quantitative terms, but also to meet the locational and qualitative needs of new and incoming businesses. Consideration needs to be given to the question of competition between other towns in Oxfordshire, including Bicester, but we find that the CS, as amended, provides an appropriate balance in this regard. Regular monitoring of economic conditions and employment land supply will ensure that the situation is kept under review. Consequently, the economic strategy in the CS remains sound and appropriate for Oxford city during the current plan period.

Homes : Jobs balance

24. There was considerable discussion at the previous hearing sessions about the implications of the RSS for the homes:jobs balance in Oxford. The RSS supports the physical and economic growth of Oxford, whilst seeking to ensure that the balance of homes and jobs at both sub-regional and Oxford city level does not worsen and preferably improves. In the future, each district will have to make a judgement about the appropriate balance of homes:jobs, seeking to reach a consensus with neighbouring authorities working in partnership.
25. The Council has updated the employment growth and housing estimates since the previous hearings closed, to take account of the deletion of the SOSDA and more recent ONS/NOMIS statistics. Further amendments to these figures (with a base employment level of 100,000 jobs) were made during the resumed hearing sessions. These figures show that the ratio of jobs to economically active people is estimated to change from 1.252 at the 2006 base-date, to between 1.231-1.259 at 2016 (based on low and high job growth estimates) and between 1.216-1.244 at 2026, assuming new employment development at the Northern Gateway is capped at 20,000 m² up to 2016 and 55,000 m² by 2026. This demonstrates that, at the end of the plan period, the jobs:economically active ratio would be no worse than it was at 2006; in fact, there would be a modest improvement.
26. There is some concern about the accuracy and methodology for these estimates, but the Council confirms that the basic methodology remains similar to that used at the previous hearing sessions, although the figures have been updated to take account of the deletion of the SOSDA and limits to development at the Northern Gateway. The calculations are complex, with a range of assumptions, particularly in terms of the estimated growth of housing and jobs, household size and economic activity rates. However, although there have been some challenges to the methodology and estimates, no-one has produced any alternative figures based on robust evidence. Any estimates are only a snap-shot in time, and can only give an indication of what might happen in the future.

27. Having considered all the evidence and representations, we believe that the Council has produced a reasonable and robust range of figures, which address the implications of the deletion of the SOSDA. They also recognise the pressures caused by in-commuting and the particular strengths of the Oxford economy, along with the environmental and other constraints to economic and housing growth. Consequently, **we recommend that the latest estimates produced at the resumed hearing sessions represent the most appropriate figures to include in the amended CS**, to ensure that it is sound [CD16/78; EC17].

South of Oxford Strategic Development Area

28. The Council's FPCs have addressed the deletion of the SOSDA, following the legal challenges to the inclusion of this proposal in the RSS, by removing all references to this proposal in the amended CS. The intended revocation of the RSS would clarify the position by confirming that the SOSDA will not go ahead in the short-medium term, particularly since South Oxfordshire DC (in whose district the land lies) does not wish to pursue the proposal. It is worth noting that earlier versions of the CS did not refer to the possibility of the SOSDA coming forward. Although the proposal was strongly supported by the City Council during the examination of the RSS, it was included in the CS as a result of the changes recommended by the EIP Panel and endorsed by the Secretary of State. There are no procedural implications related to its deletion in the CS, particularly since this amendment has been subject to consultation as part of the FPCs, and we have already endorsed these changes to the CS.
29. The main reason for proposing the SOSDA was to help meet the housing needs of Oxford city. Its deletion means a loss of 4,000 dwellings within the current plan period, which will not be replaced elsewhere within Oxford city or in the surrounding area in the short term. This element represents a third of the total housing provision for Oxford city set out in the RSS (8,000+4,000=12,000 dwellings), and would affect the ability of the CS to meet Oxford city's housing needs and improve the overall housing:jobs balance. However, the Council has amended the employment and housing growth estimates to take account of its deletion and, in the longer term, joint working with the surrounding local authorities could examine the need for, and feasibility of, considering where any additional housing to meet Oxford city's needs could be accommodated. However, given the uncertainty surrounding this proposal, it is not necessary for the current CS to consider this future possibility as a contingency in the longer term.
30. In earlier versions of the CS, the SOSDA would have had benefits for the regeneration of Blackbird Leys/Greater Leys, particularly in terms of the provision of further retail and other facilities, and for the enhancement of Cowley centre as the largest of the city's district centres. However, the Council is committed to the regeneration of Blackbird Leys, including progressing an Area Regeneration Plan. The loss of the SOSDA may diminish the impetus to regenerate Blackbird Leys, particularly in the current economic climate, but it would not undermine the overall prospects for this centre in terms of its enhanced community role. There is no new evidence to suggest that Blackbird Leys should not be designated as a district centre in the CS. Similarly, the loss of the SOSDA is likely to have only a marginal impact on the proposals to develop Cowley centre, since

this centre is well placed to serve an enhanced role in the hierarchy of centres, with good accessibility and several potential redevelopment sites. Consequently, we do not see the deletion of the SOSDA as having a significant detrimental effect on the Council's aspirations to enhance the status of these centres.

Northern Gateway

31. Proposals for a new employment-led development at the Northern Gateway remain as contentious as ever, since the previous hearing sessions closed. In its FPCs, the Council intends to set a maximum ceiling for the amount of Class B floorspace, limited to 20,000 m² up to 2016 and 55,000 m² by 2026. This would ensure that the homes:jobs balance does not worsen, and preferably improves during the current plan period, and ensure that the delivery of employment uses does not run ahead of housing delivery. In order to further improve the homes:jobs balance, the overall amount of housing is to be set at the upper end of the range previously specified (i.e. 200 dwellings). However, at the hearing sessions, the Council accepted that further development could take place after 2026, up to a maximum of 80,000 m² of business floorspace. The Council reconfirms that a detailed AAP will establish the precise nature, mix, scale, location and phasing of land-uses at the Northern Gateway. The Northern Gateway represents some of the last remaining greenfield land within the city boundary suitable for new employment-led development. We consider it is important that such land is not used up for other types of development, except where they are complementary and necessary to secure the overall viability and delivery of the project.
32. At the resumed hearings, NGC put forward a slightly revised package, with a limit of 55,000 m² of business uses, 500 dwellings and a range of complementary land uses, including a new primary school. However, we consider the elements of the scheme set out in revised Policy CS6 suggested by the Council provide a more appropriate scope and mix of land-uses, which will be determined in more detail by the subsequent AAP. The fact that neither the full details of the required infrastructure, nor the sources of funding to deliver them, have been resolved in detail does not render the policy, its proposals or priorities unsound. At this unusual point in time, with an absence of clarity over the availability of public funding, we find that the CS provides an appropriate framework for more detailed proposals at the Northern Gateway to be taken forward when required.
33. As for phasing of the development, this would ensure that employment development does not run ahead of housing provision, and recognise that completion of any part of the new development would be unlikely much before 2016, with all the necessary preparation and mitigation work. The precise limits on business floorspace seem reasonable, but much would depend on resolving the constraints to development and mitigating environmental and traffic issues, as well as economic conditions. The key to bringing the site forward will be the resolution of the considerable traffic implications arising from the proposed development. This may be compounded by recent financial cuts in the Access to Oxford initiative, along with the traffic implications of the Water Eaton parkway station. We therefore consider it is vital that any policy for the Northern Gateway recognises that the development is dependent upon securing of measures

designed to mitigate the impact on the local and strategic road networks, acceptable to both the Highways Agency and Highways Authority and their implementation prior to the occupation of the development. Accordingly, **we reiterate our recommendation to add this clause to Policy CS6.**

34. In addition, we urge the Council to fully consult and engage with the local community, organisations and other stakeholders when drawing up the detailed proposals for the Northern Gateway. This will ensure that some of the distrust, mis-information, confusion and uncertainty about these proposals that typified some of the hearing sessions will not be repeated when the subsequent AAP is examined.
35. We also conclude that the intended revocation of the RSS would not have any serious implications for the Northern Gateway proposals, which are independently justified in the evidence base accompanying the CS.

Implications of the intended revocation of the RSS for other Policy areas

(a) Sub-regional strategy for Oxford

36. The intended revocation of the RSS would result in the loss of the regional strategic framework for the Central Oxfordshire sub-region. However, this sub-regional strategy was drawn up by the central Oxfordshire local authorities when the RSS was being prepared and is supported by the original evidence base, along with that accompanying the CS. One of the key elements of the strategy was the proposed SOSDA, which we have dealt with earlier in this part of our report.
37. An important consideration is that the strategy for the central Oxfordshire sub-region was not imposed on the constituent authorities, but was formulated and supported by them when the RSS was being prepared. Much of the strategy is based on geographical and economic factors, with Oxford city as the main regional hub and economic focus for the sub-region. The City Council continues to support this strategy, with the importance of Oxford as the main centre for the sub-region, nurturing its future success whilst protecting its historic environmental character, setting and Green Belt. Questions about the future strategy for the sub-region and the future role of Oxford will be addressed through the emerging sub-regional structure of joint local authority working, including the Spatial Planning Group and Local Enterprise Partnership. Consequently, we consider the CS could stand on its own in terms of its relationship to the sub-region in the absence of the RSS.

(b) Green Belt

38. Policies SP5 & CO4 of the RSS confirm the role and maintenance of the Green Belt around Oxford, whilst requiring a selective review of the Green Belt boundaries on the southern edge of Oxford to accommodate the SOSDA and enabling small-scale local reviews of Green Belt boundaries in other locations. With the intended revocation of the RSS, national guidance in PPG2 would continue to apply, but the Council could consider the desirability of adjusting existing Green Belt boundaries, working with other local authorities (CD11/35).

39. The intended revocation of the RSS would mean that there is unlikely to be a comprehensive review of the Green Belt around Oxford in the short-medium term, particularly since the Council considers there is no appetite for such a review. However, CS Policy CS4 enables a small-scale review of the Green Belt boundary at the Northern Gateway to be undertaken as part of the subsequent AAP, subject to meeting the normal PPG2 criteria. In these circumstances, it is for the Council and adjoining local authorities to determine and justify any amendments to the Green Belt boundary in the future based on these criteria.
40. Some representors argue that, in the absence of the specific Green Belt policies of the RSS, the Green Belt policy in the CS should be strengthened, setting out the specific purposes of the Green Belt around Oxford and indicating the basis for making planning decisions on sites in the Green Belt. However, the purposes of the Green Belt around Oxford are already set out in the text accompanying Policy CS4, and the other suggested text simply repeats national policy in PPG2. We are therefore satisfied that Policy CS4 provides an appropriate policy basis for maintaining the Green Belt boundary around Oxford and considering any future amendments in the absence of the RSS.

(c) Highways, traffic and transport

41. RSS Policy SP2 identifies Oxford as one of 22 regional hubs in the South-East, but its intended revocation would not necessarily alter the pivotal role that Oxford plays as a regional transport node, particularly given the role of Oxford station as a rail/bus interchange and that of the city centre as the central hub of the county-wide bus network. Central to the future of transportation in and around Oxford is the Access to Oxford project, which remains a priority for the County Council. The likelihood of central funding for this project is in doubt with the current spending reviews, but the County Council and its partners are actively looking for other sources of funding to implement this key project.
42. Significant transport issues remain for the city, and without the transportation framework of the RSS, the policies of the CS would play an even more important part in integrating land-use and transport objectives and bringing forward the infrastructure and behavioural changes necessary to manage traffic in and around Oxford. Joint working with Oxfordshire County Council, including work on the emerging new Local Transport Plan (LTP3), will help to set a framework for future infrastructure and investment decisions, within the framework established in the CS.
43. Since the previous hearing sessions closed last September, little has happened, apart from amendments to the phasing of the Northern Gateway development, further progress with the Chiltern Railways' "Evergreen 3" proposal and a review of the Access to Oxford project. With the current spending reviews, funding for transportation projects is more uncertain, and so each development will have to ensure that it addresses its own transport and traffic generation consequences. There will be a need to ensure that any spending is aligned to meet the most important priorities to provide integrated schemes. Work on the LDF Infrastructure Plan and Local Investment Plan will assist in this regard.

44. At the resumed hearing sessions, reference was made to a report on the transport implications of the CS produced for the City Council by Peter Headicar, which had not been released earlier. This casts some doubt on certain key proposals of the CS, including the Northern Gateway, but is one consultant's view based on no new evidence or traffic figures, and tells us little we did not know already. We also note that the Highways Agency remain concerned about the traffic and transport implications of this project, but the NGC continues to work on the technical highways and traffic aspects of this proposal, and this will be a matter for more detailed consideration as the AAP is prepared. Further work on the Local Transport Plan will also address key transport and traffic issues relevant to Oxford.

45. Consequently, the intended revocation of the RSS and other transportation and traffic information and reports that have become available since the original hearings closed would not undermine or seriously question the underlying transportation strategy in the amended CS.

(d) Hierarchy of centres, including town, local and other shopping centres

46. Oxford has an established hierarchy of centres, comprising the city centre, district and neighbourhood centres. The RSS only identifies Oxford city centre within the strategic network of town centres (Policy TC1). The CS builds on the existing spatial pattern and highlights the potential for Cowley centre to become a primary district centre, along with an enhanced role for Blackbird Leys centre. The intended revocation of the RSS would not change the factual situation that Oxford city centre will continue to be at the top of the local hierarchy of centres as the main focus for town centre-related developments. In the absence of the RSS, national policy in PPS4 would continue to apply in determining planning applications for retail, leisure and other main town centre uses. Consequently, the intended revocation of the RSS would have no significant implications for the hierarchy of centres established in the amended CS.

(e) Environmental policies

47. The intended revocation of the RSS would take away the regional framework of environmental policies, including those covering the natural and built environment, heritage, biodiversity, flooding and climate change. However, the CS does not rely on the RSS policies, but used national policies as its starting point, including those in PPS1, PPS9, PPS22 & PPS25. The Council's Natural Resources Impact Analysis SPD also covers natural resources and energy efficiency, with targets for on-site renewable energy generation, energy and water resources efficiency, in line with CS Policy CS9. Targets and thresholds for energy efficiency will be reviewed in the Sites & Policies DPD. A comprehensive SFRA informed the development strategy, and Policy CS11 stands independently of the RSS. The CS also takes a comprehensive approach to biodiversity, including ecologically important sites, as set out in Policy CS12.

48. Although the RSS gives a strategic framework for these policy areas, we consider the CS could stand on its own in the absence of the RSS, with its own supporting evidence base and set of strategic policies. More detailed policies covering these policy areas can be considered in the subsequent Sites & Policies DPD.

(f) Cross-boundary and sub-regional issues

49. Independent of the RSS, we understand that there are established mechanisms to enable continued discussions between the City Council and its neighbouring authorities, with regular meetings of officers and members to discuss spatial planning issues. In the past, there has been a considerable amount of cross-boundary working on sub-regional issues, and this is expected to continue under the current regime. In fact, with the emerging joint Local Enterprise Partnership and work on the Local Investment Plan, joint working may become a greater feature in establishing the planning framework for the wider sub-region. Discussions with the Homes & Communities Agency as part of the “single conversation” may also assist. The loss of the RSS would therefore be likely to encourage rather than diminish the need for cross-boundary joint working on sub-regional issues in the future.

(g) Flexibility and contingencies

50. The intended revocation of the RSS would be unlikely to have a significant effect on the degree of flexibility and contingency already built into the CS. The RSS specifies the pattern of regional growth by adopting individual targets and objectives, rather than determining which sites should be developed. The amended CS considers a contingency strategy to ensure that the housing targets are met, allocating safeguarded land at Summertown and by identifying more housing sites than required in the latest SHLAA.
51. Given the constraints to development in and around Oxford, there is little alternative to the development of strategic sites at the Northern Gateway and West End, but there may be some limited opportunity for employment growth in the district centres. Little has changed since the previous hearings closed and no new evidence has come forward to indicate that the CS does not provide sufficient flexibility and contingencies to ensure that the strategy is delivered.

(h) Other matters and issues

52. Although the CS policy relating to Gypsies & Travellers accommodation was not discussed at the resumed hearing sessions, we note that the new Coalition government has announced that Circulars 01/2006 & 04/2007 are to be revoked and the level of pitch provision should be determined locally¹. However, since the Council will consider the precise level of provision for gypsies and travellers in the forthcoming Site Allocations DPD, this announcement does not materially affect the soundness of CS Policy CS26. We see no need to alter the policy or accompanying text to reflect this future direction of policy.
53. At the resumed hearings, a wide variety of other points were made, but most of these tended to repeat matters already discussed at the previous hearings sessions, or did not directly relate to the soundness of the CS and the matters before us at this time.

¹ Ministerial statement by Rt Hon Eric Pickles (Secretary of State for Communities & Local Government) [dated 29 August 2010]

Conclusions

54. We therefore conclude that the Council's FPCs would properly address the situation in terms of the deletion of the SOSDA, including amendments to the mix and phasing of land-uses at the Northern Gateway and the updated information on the homes:jobs balance. We also consider that the intended revocation of the RSS would have no significant implications for the amended CS, and that it essentially stands on its own, supported by its own independent evidence base. In essence, we heard nothing at the resumed hearings to conclusively demonstrate that the amended CS is not sound, provided that it is amended in the ways set out in our report.

Post-hearing events

55. Following the close of the resumed hearing sessions on 17 September 2010, the Secretary of State's decision to revoke the Regional Strategies was successfully challenged in the High Court². The outcome, on 10 November 2010, is that the adopted RSS forms an ongoing part of the statutory development plan. We consulted the Council and all representors on this position and have taken account of all the representations received. A further legal challenge to the Secretary of State's statement on 10 November 2010, along with the accompanying letter from the Chief Planner and the Secretary of State's original letter of 27 May 2010, indicating that the intention to revoke the RSS was a material consideration in making planning decisions, has also been made. Until this matter is determined, the existence of the challenge and the basis of it may affect the significance and weight which may be given to these statements and letters³.
56. The legal position regarding the weight to be given to the Government's intention to abolish Regional Strategies is therefore somewhat uncertain at the current time. However, during this examination and at the two series of hearing sessions, we have considered the soundness of the CS both with and without the RSS. SEEPB has confirmed⁴ that the amended CS is in general conformity with the RSS, and we have concluded that, with or without the RSS, the CS is soundly based. Although the legal position is somewhat uncertain at present, the CS can stand on its own, supported by its own evidence and assumptions, whether or not the RSS is revoked. In fact, we have already taken account of the latest amended status of the RSS, reinstating it as part of the development plan, during this examination.
57. We have also considered the implications of the reinstatement of the RSS for the SOSDA, particularly since the Council proposes to remove all references to this proposal in the CS. Of course, the SOSDA was the subject of a legal challenge, hence its proposed deletion from the CS. We understand that SODC remains opposed to this proposal and there is little indication that landowners intend to progress the project in the near future. Although the proposal was intended to help meet Oxford's housing needs, it lies wholly outside the administrative boundary of the Oxford Core Strategy. Apart from ensuring that the project could be integrated with the

² *Cala Homes (South) Ltd v Secretary of State* [2010: EWHC 2866]

³ *Planning Inspectorate web-site: http://www.planning-inspectorate.gov.uk/pins/news_notices/whats_new/cala_homes.html*

⁴ *Letter from South-East England Partnership Board (15 May 2009)*

existing built-up area as an urban extension, the CS could not make any firm proposal or commitment to the project. It not critical to the implementation of the plan, and nor is the future of the SOSDA dependent on the outcome of this CS.

58. From the evidence before us, there is no realistic prospect of the SOSDA coming forward in the short-medium term, and SEEPB⁵ has confirmed that its deletion from the CS would not take the plan out of general conformity with the RSS. Consequently, deleting the SOSDA from the CS remains the most appropriate course of action in all the circumstances.
59. Several participants argue that the CS should not be finalised whilst the future status of the RSS and the Secretary of State's statements and Chief Planner's letter remains uncertain in legal terms and the Government develops its new planning system as part of the Localism Bill. However, it is likely to take some time before the Localism Bill is finally enacted. No new matters which conclusively indicate that the CS is unsound or undeliverable have been raised, and so there is no need to re-open the hearing sessions. The Government has not indicated that it wishes to delay plan preparation until the Localism Bill is enacted. Given the length of time this examination has taken, and the fact that we have considered the implications of scenarios both with and without the RSS, we consider it is in the interests of the Council and the wider public interest to resolve the position as soon as possible. This will provide certainty and enable the much-needed delivery of housing and regeneration in the city. To incur further delay would prolong the uncertainty and put at risk key development projects in Oxford.
60. The Council suggests that a preface could be included in the plan, explaining that the CS was prepared in the context of the adopted South-East Plan RSS, and if this is revoked, all references to it in the plan should be prefaced with the word "former". However, it is likely that when the CS is adopted, the RSS will still be part of the statutory development plan. If and when the RSS is revoked, the Council can consider whether there is a need to review the CS. In the meantime, the CS needs to refer to the current status of the RSS in the text of the plan.

Summary of main recommendations

61. For the avoidance of doubt, the following is a summary of our main recommendations for amendments to ensure that the CS is sound:
 - a. Incorporate the original Proposed Changes (April 2009) into the Core Strategy, except where amended by subsequent changes and our recommendations [1:2.5];
 - b. Incorporate the Council's Further Proposed Changes (April 2010) into the Core Strategy, including those changes set out in the Combined Changes to Submission document (CD1/5), except where amended by later changes and our recommendations [2:11];
 - c. Incorporate the Council's proposed additional changes as a result of discussion at the hearing sessions in September 2010, except those relating to the revocation of the RSS (CD16/78) [2:14];

⁵ Confirmed by South-East England Partnership Board (Procedural Meeting: 09/02/10)

- d. Remove the general references to small-scale reviews of the Green Belt [1:4.24];
- e. Provide more detail on the homes/jobs balance [1:4.55], updated to reflect the latest figures [2:27];
- f. Revise the policy on student accommodation [1:4.84];
- g. Strengthen the policy on the built environment [1:4.109].
- h. Amend Policy CS9 to confirm that all developments should seek to minimise their carbon emissions [1:4.13];
- i. Amend the text accompanying Policy CS23 relating to density [1:4.59];
- j. Additional detail on infrastructure provision, including schools [1:4.117];
- k. Amend the policy for the West End, including schools and the need for a flood risk management plan [1:4.124];
- l. Amend the policy for the Northern Gateway, including securing measures to mitigate impact on the road network, including additional text to reflect the views of Natural England, and including an indicative boundary for the AAP [1:4.154; 2:33];
- m. Amend the policy for Barton, including references to schools, and including a defined boundary for the strategic development area on the Key Diagram [1:4.160];
- n. Amend the policy for Summertown, including references to the need to meet the requirements of the Habitat Regulations and Appropriate Assessment, and deleting the star marking this strategic area on the Key Diagram [1:4.171];
- o. Amend Policy CS2 to confirm the position on Safeguarded Land [1:4.171];
- p. Strengthen the Monitoring section [1:4.173];
- q. Addition of page and paragraph numbering [1:2.5].

(References are to paragraph numbers in our report)

Overall Conclusion and Recommendation

62. **We therefore conclude that, with the recommendations we recommend, the Oxford Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. We therefore recommend that the plan be changed accordingly, including the changes set out in the attached schedules.**

David Fenton

Stephen J Pratt

Inspectors

This report is accompanied by:

Appendix A (separate document): Council's proposed changes needed to ensure the plan is sound:

A1: Council's Further Proposed Changes (April 2010)
(including Maps A & B) (CD1/3)

A2: Council's proposed Examination Changes, as a result of discussions
during the September 2010 hearing sessions (CS16/78)

Appendix B (attached): Changes that the Inspectors consider are needed to make the plan sound

Appendix B – Changes that the Inspectors consider are needed to make the plan sound

These changes are required in order to make the Core Strategy sound:

(Policy references relate to the Combined Changes version of the Core Strategy September 2010 – CD1/5).

Inspector Change No.	Policy	Change
IC1	Whole plan	Introduce all the changes set out in the Council's Proposed Changes (April 2009) [CD1/1], except where amended by later changes or recommendations
IC2	Whole plan	Introduce all the changes set out in the Council's Further Proposed Changes (April 2010) [CD1/3], including the changes set out in the Combined Changes to Submission Version [CD1/5], except where amended by later changes or recommendations
IC3	Whole plan	Introduce all the changes set out in the Council's Examination Changes (September 2010) [CD16/78], except those relating to the revocation of the RSS
IC4	Whole plan	Add page and paragraph numbers throughout the plan
IC5	Policy CS2	Reword the third paragraph of Policy CS2 to read: <i>"Land at Northern Gateway and Barton is no longer safeguarded and is re-designated in accordance with Policies CS6 and CS7. Consequently, Local Plan Policy NE.3 will need to be retained."</i>
IC6	Policy CS4	Delete the third and fourth sentences of Policy CS4 and replace by: <i>"The Northern Gateway AAP will consider small scale, minor changes to the Green Belt boundary in the immediate vicinity of the currently safeguarded land, where this may be necessary to achieve a suitable and appropriate site for development. Land here will only be released from the Green Belt if exceptional circumstances are shown to exist and all the following criteria are met."</i>
IC7	Policy CS5	Add the following to the penultimate paragraph of the supporting text: <i>"The West End partnership has a vision for a primary school at the heart of the West End community. This will require a suitable site and full funding. The partnership will seek to achieve this, with funding in the first place through developer contributions and through other appropriate sources."</i> Add a new bullet point in Policy CS5 to read: <i>"A new 1-form entry Primary School to serve the area."</i> Add a new bullet point in the key outputs to read: <i>"A new 1-form entry Primary School to serve the area."</i> and Add the following wording to the supporting text: <i>"A Flood Risk Management Plan will be prepared to ensure that an appropriate level of safe access is provided in the</i>

		<i>area during times of flood."</i>
IC8	Policy CS6	<p>Add the following to the penultimate paragraph of Policy CS6: <i>"Development is dependent upon the securing of measures designed to mitigate the impact on the local and strategic road networks, acceptable to both the Highways Agency and Highways Authority. The mitigation measures must be implemented in accordance with the agreed phasing, with full implementation prior to the occupation of the final development phase."</i></p> <p>Unless the Proposals Map is amended at adoption by the deletion of the star and its replacement by the indicative AAP boundary as shown on Map A, Policy CS6 will be unsound.</p>
IC9	Policy CS7	<p>Amend the third output to read: <i>"to deliver a new multi-purpose community building based around a new primary school on site, and access to secondary education."</i> and</p> <p>Add a new bullet point under Delivery and partnership to read: <i>"provide for the timely funding and delivery of the necessary community facilities required to meet the needs of the development."</i></p> <p>Unless the Proposals Map is amended at adoption by the deletion of the star marking the strategic area and is replaced by the delineation of the site in accordance with Map B, Policy CS7 will be unsound.</p>
IC10	Policy CS8	<p>Add the following words to the supporting text to Policy CS8: <i>"To meet the requirements of the Habitat Regulations any masterplan for the area will need to be informed by an Appropriate Assessment of the potential hydrological and air quality impact on the Oxford Meadows SAC."</i></p> <p>Unless the Proposals Map is amended at adoption by the deletion of the star marking this strategic site, Policy CS8 will be unsound.</p>
IC11	Policy CS9	<p>Add to the beginning of Policy CS9: <i>"All developments should seek to minimise their carbon emissions."</i></p>
IC12	Policy CS16	<p>Delete the second paragraph of Policy CS16 and replace by: <i>"The strategic development areas at Barton and West End, and potentially Summertown, will identify suitable provision for primary school(s). Funding to enable the timely provision of the necessary education facilities will be sought from the developments that generate that need."</i></p>
IC13	Policy CS16	<p>Add the schedule attached as Appendix 1 to the Council's statement CD16/32 to Section 9 on implementation; Change the fourth bullet point to the key service and site-specific infrastructure improvements in Policy CS17, to read: <i>"Local community infrastructure, including police</i></p>

		<p><i>services, in accordance with policies CS20 and CS21.”</i></p> <p>Change the wording in the second bullet point in the second paragraph of section 3.5 to read: <i>“service infrastructure: needed to meet the day-to-day needs of the population (for example, schools, policing, affordable housing, community facilities, open spaces etc);”</i></p>
IC14	Policy CS18	<p>Delete the second part of Policy CS18 and replace with: <i>“Development proposals should respect and draw inspiration from Oxford’s unique historic environment (above and below ground), responding positively to the character and distinctiveness of the locality. Development must not result in loss or damage to important historic features, or their settings, particularly those of national importance and, where appropriate, should include proposals for enhancement of the historic environment, particularly where these address local issues identified in, for example, conservation area character appraisal or management plans. Views of the skyline of the historic centre will be protected.”</i></p>
IC15	Policy CS23	<p>Delete the sentence <i>“Developments...tenure”</i> in paragraph 6 of Section 7.2 and replace with: <i>“Developments will be expected to make efficient use of land, and reflect the guidance on densities at national and regional level. Specific density standards are not prescribed in this plan because the emphasis is firmly placed on the achievement of an appropriate mix of dwelling types, sizes and tenure.”</i></p>
IC16	Policy CS25	<p>Delete Policy CS25 and replace with: <i>“Planning permission will only be granted for additional academic/administrative accommodation for the University of Oxford and Oxford Brookes University where that University can demonstrate: in the first place that the number of full-time students at that University, who live in Oxford but outside of university-provided accommodation, will, before the particular development is completed, be below the 3,000 level and once that figure is reached, thereafter will not exceed that level. All future increases in student numbers at the two Universities as a result of increases in academic/administrative floor-space must be matched by a corresponding increase in purpose built student accommodation. Student accommodation will be restricted in occupation to students in full-time education on courses of an academic year or more. Appropriate management controls will be secured, including an undertaking that students do not bring cars to Oxford.”</i></p> <p>Delete sentences: <i>“In addition of Oxford.”</i> and <i>“Student accommodation built Development Management DPD.”</i> from the second paragraph of section 7.4 and replace with: <i>“In addition, all new student</i></p>

		<i>accommodation (built either speculatively or directly by the Universities or Colleges) will be restricted in occupation to students in full-time education on courses of an academic year or more.</i>
IC17	Section 5.3	Delete the remainder of the second paragraph from: <i>"In terms of the West End existing schools"</i> and replace with: <i>"The West End partnership is committed to achieving a new primary school as the basis of a wide ranging community facility within the area. This will require suitable land and full funding for the school. Regarding land at Barton, the County Council indicate that this site would bring in enough primary school pupils to trigger a need for a new 1.5 or 2 form entry primary school. A new multi-purpose community facility, including a primary school, will be provided as part of the development."</i>