

Report to: Executive Board - Monday 22 July 2002

**FIRST DEPOSIT DRAFT SOUTH OXFORDSHIRE LOCAL PLAN 2011**

<p><b>Report of:</b> <i>Planning Policy Manager</i></p> <p><b>Report Author:</b> <i>Mark Jaggard, Community Services, Tel no. 01865 252161 Email: mjaggard@oxford.gov.uk</i></p> <p><b>Lead Member Responsible:</b> <i>Councillor Colin Cook</i></p> <p><b>Overview and Scrutiny Committee Responsibility:</b> <i>Environment Overview and Scrutiny Committee</i></p> <p><b>Key Decision:</b> <i>No</i></p>	<p><b>WARDS AFFECTED</b></p> <p><i>All</i></p>
<p><b>SUMMARY AND RECOMMENDATIONS</b></p> <p>The purpose of this report is for Members to agree the Council's response to the First Draft Deposit South Oxfordshire Local Plan 2011.</p> <p>The Council's current input into the review of the South Oxfordshire Local Plan will be provided from the existing staff resources in the Planning Policy team. However, there may need to be further inputs of resources at different stages of the process.</p> <p>South Oxfordshire District is an adjacent authority to Oxford. It is therefore important to ensure that the South Oxfordshire Local Plan 2011 is co-ordinated with our emerging Local Plan as it will help achieve all five strategic aims in the Council's vision, i.e.</p> <ul style="list-style-type: none"> <li>• Sound management;</li> <li>• Strengthening local communities;</li> <li>• Reducing poverty and inequality;</li> <li>• Improving the physical environment; and</li> <li>• Reducing our use of resources.</li> </ul> <p>The Executive Board is ASKED to</p> <ul style="list-style-type: none"> <li>• thank South Oxfordshire District Council for consulting Oxford City Council on the First Draft Deposit Oxfordshire Local Plan 2011; and</li> <li>• agree the response to the First Draft Deposit South Oxfordshire Local Plan 2011 as set out in Appendix 1.</li> </ul>	

1. South Oxfordshire District Council have placed the Draft South Oxfordshire Local Plan 2011 on first deposit. The consultation period runs from Friday 21<sup>st</sup> June to Friday 2<sup>nd</sup> August 2002. Comments made after that date will not be considered.
2. As an adjacent authority we should comment only on matters which affect Oxford City.
3. The Oxfordshire Structure Plan Issues Paper was consulted on earlier this year. The Executive Board on the 17 June 2002 endorsed Officer comments made on that paper. These comments are pertinent to the comments made to the South Oxfordshire Local Plan, in particular those relating to an urban extension of Oxford south of Grenoble Road.
4. Appendix 1 to this report sets out the comments on their Plan which are important to Oxford. These comments primarily relate to Residential, Economic and Transport issues. These comments are either 'informal', 'formal support comments' or 'formal objection comments'. Following Executive Board these comments will be transferred onto the formal comment forms and sent to SODC by the 2<sup>nd</sup> August 2002.

THIS REPORT HAS BEEN SEEN AND APPROVED BY THE PLANNING POLICY MANAGER AND THE PORTFOLIO HOLDER FOR ECONOMIC DEVELOPMENT, PLANNING AND TRANSPORT (COUNCILLOR COLIN COOK).

**Appendix 1:** Response to the First Draft Deposit South Oxfordshire Local Plan 2011.

**Background papers:** First Draft Deposit South Oxfordshire Local Plan 2011; and the Council's response to the Oxfordshire Structure Plan Issues Paper.

## **OXFORD CITY COUNCIL'S COMMENTS ON FIRST DEPOSIT DRAFT SOUTH OXFORDSHIRE LOCAL PLAN 2011**

### **INTRODUCTION:**

Oxford City Council (OCC) thanks South Oxfordshire District Council (SODC) for consulting them on the First Deposit Draft South Oxfordshire Local Plan 2011 (SOLP).

As a neighbouring authority, OCC considers that it is important that SODC and OCC work closely together so that the two Local Plan's for the areas are consistent and the overall strategy of the two authorities is sustainable and coherent. OCC feels that the most important factors to be considered are housing, transport, employment and retail issues. As such, OCC's comments about the SOLP primarily concern these issues.

### **HOUSING ISSUES – SECTION 5**

#### **Urban Extension to Oxford**

The First Draft Oxford Local Plan 2001 – 2016 has considered the capacity of Oxford to accommodate residential development upto 2016. It concluded that Oxford has the capacity to deliver 256 dwellings per year throughout the Plan period without damage to its character or over loading its infrastructure. However, there is a vast level of housing need within Oxford, which cannot be met within its boundary. It is therefore considered that a PPG3 type urban extension would be sustainable and allow further residential development, which could meet some of this need. This issue is already being pursued with Oxfordshire County Council as part of the Structure Plan review.

An urban extension of Oxford, south of Garsington Road, within South Oxfordshire's boundary would be in line with PPG3 and would involve the development of some low grade Green Belt land but would not impact on the setting of Oxford. It is considered that this would be sustainable because:

- there is a concentration of key employers in Oxford;
- there is a good public transport network which is capable of being expanded to serve additional development near to Oxford, including the proposed Guided Bus/light rail link; and
- there is the ability to improve the capacity of local facilities and services for local people. For example, key workers, such as nurses, need to be located on good public transport routes and/or near to the hospitals due to shift work.

The size of the urban extension needs careful consideration so that it is large enough to provide a district centre and the appropriate range of infrastructure, but small enough that it functions as an urban extension rather than a new settlement. SODC must plan for the possibility of such an urban expansion in its current Plan, otherwise SODC would have to formally alter their Plan in order to accommodate this proposal. OCC therefore needs to formally object to the Policies in the SOLP, which would prevent this proposal coming forward.

**Green Belt Boundary/Proposals Map**

Policy GB1 in Section 3 defines Green Belt Boundary. The Proposals Map illustrates the Green Belt boundary.

**Formal Comment – Objection:**

**OCC object to Policy GB1. The Green Belt boundary should be reassessed to allow for the possible future southern expansion of Oxford into South Oxfordshire.**

**Formal Comment – Objection:**

**OCC object to the Green Belt boundary as it is shown on the Proposals Map. The Green Belt should be reassessed to allow for the possible future southern expansion of Oxford into South Oxfordshire.**

**End Date of the Plan**

OCC suggest that the end date of the Plan be changed from “2011” to “2016” so that it complies with the Structure Plan review and the First Draft Oxford Local Plan 2001-2016. This is supported by PPG12 (paragraph 6.8) which states that a Local Plan should run for a ten years from the Plan's forecast adoption date.

Such a change would enable an urban extension of Oxford into the South Oxfordshire boundary to be planned so that it may occur in the future. Such a scheme would be easier to deliver with a longer review Plan period in operation.

**Formal Comment – Objection:**

**OCC objects to the end date of the Plan. The Plan should make provision for development to 2016.**

**Provision of Land for Residential Development**

Policy H1 ensures that sufficient land is released for housing but will not let the Structure Plan figures be significantly exceeded.

Policy H6 outlines where land will not be released for new houses. This includes in the countryside and does not allow the extension of exiting settlements in the District.

**Formal Comment – Objection:**

**OCC objects to Policies H1 and H6 as they would not allow the future urban extension of Oxford into South Oxfordshire.**

**Key Worker Dwellings**

The SOLP does not deal with Key Worker Dwellings. This is an important policy for the County, especially with the problems of recruiting public sector workers such as police, fire fighters, nurses, paramedics, and teachers.

**Formal Comment – Objection:**

**OCC object to the omission of a Key Worker Dwelling policy in South Oxfordshire's Local Plan. If the urban area of Oxford is to be extended southward, into South Oxfordshire's district, it would be necessary for any proposed development to be controlled by stringent Key Worker and Affordable Dwelling policies, in line with OCC's proposed Local Plan policies.**

**It is recommended that a Policy be included in the Local Plan, such as:**

**“In addition to any Affordable Dwellings required by affordable dwelling policy, all residential developments should, where suitable, include the provision of Key Worker Dwellings on-site. This should be available to Oxfordshire’s workers (both initial and subsequent occupiers). The artificial subdivision of sites with the effect of circumventing policy will not be permitted. A range of unit sizes of Key Worker Dwellings, having regard to local circumstances and site characteristics, should be provided.”**

### **Affordable Dwellings from Commercial Development**

The SOLP does not include a policy relating to the provision of affordable dwellings from commercial development.

#### **Formal Comment – Objection:**

**OCC object to the omission of a Policy to require affordable dwellings to be provided from commercial/employment development. This would create more sustainable communities and further meet local housing need. It is recommended that a policy be included in the Local Plan, such as:**

**“New commercial development over 200m<sup>2</sup> will be expected to contribute to the provision of Affordable Dwellings.”**

### **Proportion of Housing on Previously Developed Land**

Government guidance in RPG9, suggests that 60% of residential development should be on previously developed land. Whilst South Oxfordshire propose that 87% will be achieved in the district excluding Didcot, only 32% will be achieved when Didcot is included in the overall figure (Paragraph 5.13, Section 5 “Meeting the Social Needs of the Rural and Urban Communities”).

OCC suggest that this figure be discussed in the Countywide sense. Regional Planning Guidance suggests that a County figure of 60% is acceptable, and with Oxford’s Local Plan proposing nearly 100% development on previously developed land, this would help the rural districts in the County to increase their percentage.

## **EMPLOYMENT ISSUES – SECTION 6**

### **Employment Generation in the District**

Policy E1 advocates Didcot for the future development of employment uses.

Policy E6 seeks to protect existing employment sites.

Policy E7 encourages working from home

Policy E8 encourages the re-use and adaptation of rural buildings that are outside or on the edge of towns.

Collectively these policies encourage employment development, which will reduce the need for people to travel out of the district to seek employment within Oxford.

**Formal Comment – Support:**

**OCC supports the economic Policies (Policies E1, E6, E7 and E8) in the Plan, which encourage employment generation in the South Oxfordshire district. This will reduce the need for people to travel out of the district to seek employment within Oxford.**

**TRANSPORT ISSUES – SECTION 8****Informal Comments**

OCC consider that the SOLP's transport policies should take more account of the policies contained in both the adopted Oxford Local Plan 1991 – 2001 and the First Draft Oxford Local Plan 2001 – 2016. The transport strategies operating and proposed for Oxford have implications for the transport strategies for the rest of the County, and as such should be given further consideration in the neighbouring district's Local Plans.

**Paragraph 8.44 – Transport Policies in Oxford**

Paragraph 8.44 in Section 8 “Supporting a Sustainable Transport Strategy”, states that “the Council [South Oxfordshire] considers that further extensions [to Thornhill Park and Ride] eastwards or southwards would be unacceptable on environmental grounds”. OCC considers that this statement is in conflict with South Oxfordshire's transport policy T4.

Thornhill car park approaches its capacity on a regular basis and may be in need of extension in the future. There is insufficient land west of the existing car park (i.e. in OCC's boundary) to accommodate any future expansion requirement. There may therefore be a requirement for South Oxfordshire to allocate land for an eastward extension in to South Oxfordshire's district.

**Formal Comment – Objection:**

**OCC objects to Paragraph 8.44, as the environmental impact of an extension of Thornhill Park and Ride will need to be assessed against the environmental benefits of the increased Park and Ride facilities. It is recommended that the paragraph be reworded as:**

**“The Council will investigate the benefits of expanding the Thornhill Park and Ride”.**

**OTHER ISSUES****Oxford Brookes University Site, Holton [Wheatley]**

Policies RUR1 and RUR2 support the limited expansion of Oxford Brookes University within the existing footprint of the campus at Wheatley. However, the amount of expansion permitted is considered to be very constrained. OCC considers that SODC should give further consideration to the advice in paragraph C16 of appendix C of PPG2, which states that:

“...It is however, Government policy to encourage more people to undertake higher and further education (HFE). There has been a large increase in student numbers and further numbers can be expected. The lack of a reasonable

alternative sites outside the Green Belt (whether within the urban area or elsewhere) for the proposed expansion of an HFE establishment, should be taken into account in preparing or reviewing a development plan. Green Belt boundaries should be altered only in exceptional circumstances, after consideration of development opportunities within urban areas...”

OCC considers that the boundary of the university's campus, shown on Map 4 in Section 9 “The Rural Areas”, is too tight and does not allow for flexibility over the Local Plan period. The area shown as being subject to RUR1 and RUR2 on the Proposals Map covers a larger area and consideration should be given to extending the area shown on Map 4 to cover most or all of this.

Oxford Brookes University requires a certain amount of development in order for it to accommodate the projected growth in student numbers, research activities and to improve the quality of its facilities.

Given the difficulties of accommodating significant expansion in Headington and the potential adverse impact on local residents, OCC considers that apart from the limited sites that have been identified within Oxford's boundary, the Wheatley and Westminster campuses provide the best opportunity for Oxford Brookes University to meet its growth requirements.

**Formal Comment – Objection:**

**OCC objects to Plan 4 on the basis that provision should be made for further expansion of the Wheatley campus. This could be accommodated without having an adverse impact on the Green Belt.**

**Redevelopment of the Oxford Brookes University Site, Holton**

Policy RUR2 point (iv) in Section 9, “The Rural Areas”, ensures that Oxford Brookes University does not increase the number of students at the Wheatley campus without providing a commensurate provision of residential accommodation.

**Formal Comment – Support:**

**OCC supports Policy RUR2 point (iv) as it is in line with the principles of OCC's policies for Oxford Brookes University and ensures that no additional pressure is put on the other University campuses by the growth of this campus**

**Paragraph 9.5**

Paragraph 9.5 in Section 9 “The Rural Areas”, states that “Oxford City Council has for many years been concerned about the impact of Oxford Brookes University's students on the housing situation in Oxford, as accommodation managed by the University caters for about 40% of full-time students. This is one of the factors that has led the [Oxford] City Council, in the past, to put pressure on this [South Oxfordshire] Council to release land in the Green Belt to provide further housing”.

**Formal Comment – Objection:**

**OCC objects to this statement; it is inaccurate and inappropriate to be written in a Local Plan. OCC recommends that this paragraph be deleted or reworded.**

## **Sandford Sewage Treatment Works**

Policy RUR5 allows the limited further development of this site within the existing footprint of the existing buildings.

### **Informal Comments**

OCC are concerned that the development of this site would cause problems for the possible, future urban expansion of Oxford into the South Oxfordshire's district. The development of the Sewage Treatment Works should form part of a large scale residential development. This raises questions about its capacity and location.

## **Shotover Country Park**

Policy RUR12 protects Shotover Country Park from development. While OCC supports the principle of this Policy, suggest that the amenity value of the Shotover Country Park would be improved with the provision of a visitor's centre. unfortunately this requires a formal objection to this Policy.

### **Formal Comment – Objection:**

<b>OCC objects to Policy RUR12 as OCC would require the provision of a visitor centre. The Policy should be amended to support the provision of a properly sited visitor centre.</b>
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## **GENERAL**

It is suggested that some of the subject headings be reworded or slightly clarified, as it is sometimes confusing to navigate through the Plan and to find particular sections.



**Minute extracts from Environment Overview and Scrutiny Committee**  
**15th July 2002**

**32. FIRST DEPOSIT DRAFT SOUTH OXFORDSHIRE LOCAL PLAN 2011**

Patricia Stevenson and Georgina Harrison (Planning Policy) presented the report on this item (previously circulated as urgent business). Councillor Cook attended as portfolio holder.

The Committee agreed with the formal comments in the report with the exception of:

- (1) Policy GB1: don't support the objection, as the Committee expresses reluctance to use any green belt land for development
- (2) Policies H1 and H6: add the caveat that the plan should be extended to 2016 but proposed housing should not be on green belt land.
- (3) Employment issues: the Committee identified a need to develop a balanced employment policy between Oxford City Council and South Oxfordshire District Council to reduce the need to travel.
- (4) Policy RUR2: to alter slightly to distinguish between pressures on housing and other buildings. (Councillors Darke, Bartleet, and Simmons declared a personal interest in this policy)
- (5) Policy RUR12: that the proposed properly sited visitor centre should also be sensitively designed.