

**Report of:** Head of City Development

**To:** Executive Board

**Date:** 4<sup>th</sup> February 2008

**Item No:**

**Title of Report :** Response to South Oxfordshire Core Strategy (Issues and Options)

### Summary and Recommendations

**Purpose of report:** To consider an appropriate response to South Oxfordshire District Council's consultation on Issues and Options for their emerging Core Strategy, and the accompanying Sustainability Appraisal report

**Key decision:** No

**Portfolio Holder:** Cllr John Goddard

**Deputy Responsibility:** Environment

**Ward(s) affected:** All

#### Report Approved by

**Portfolio Holder:** Cllr John Goddard

**Legal:** Legal & Democratic Services (Jeremy Thomas)

**Executive Director:** Michael Crofton-Briggs (Acting)

**Finance:** Financial Management (Christopher Kaye)

**Head of Planning:** Michael Crofton-Briggs

**Policy Framework:** The South Oxfordshire Core Strategy will have significant implications for planning future development around Oxford, and on the Oxford economy, housing market, transport networks and other aspects of spatial planning. This response is made in the context of the emerging Oxford Core Strategy, and the Panel Report on the draft South East Plan.

#### Recommendation(s):

That the Executive Board agrees to:

1. Approve the draft response to South Oxfordshire District Council attached as Appendix A, and authorise the Planning Policy Manager to make any minor editorial corrections necessary, then formally submit the response.



## Summary

1. South Oxfordshire District Council is currently inviting comments on its Core Strategy Issues and Options consultation paper. This document represents the first stage of consultation on their Core Strategy, which, when adopted, will form an overarching spatial planning framework within the district boundaries of South Oxfordshire.
2. A key concern of the City Council is to take forward the proposal for a new urban extension to the south of Oxford, which would be developed on land within South Oxfordshire District. The draft response attached deals primarily with this issue. Brief comment is also made on the issues of affordable housing thresholds and tenure, and on transport issues, where these may affect the future shaping of Oxford.

## Vision and strategic aims

3. The spatial vision and objectives for Oxford have been set out in Oxford 2026: Core Strategy Preferred Options Document, which was approved by Executive Board on 19<sup>th</sup> March 2007. These closely reflect the Council's corporate priorities, in respect of spatial planning. The most relevant of these, as regards this report, can be summarised:
  - Provide more affordable and family homes, of appropriate tenures, types and sizes, to meet existing needs and future population growth as far as possible;
  - Strengthen and diversify Oxford's economy and provide a range of employment opportunities across the City;
  - Ensure an appropriate balance of housing and employment growth;
  - Ensure that new developments are located in accessible locations to minimise overall travel demand.

## Background

4. The context for this report is set by the South East Plan Panel Report (August 2007). The Panel Report was published by the panel of inspectors who, in late 2006 and early 2007, conducted an independent examination of the South East Plan, or SEP (which on adoption will become the Regional Spatial Strategy for the South East). The Panel made a number of recommendations in respect of the Central Oxfordshire sub-region. The main changes affecting Oxford relevant to this consultation were to support:
  - a Strategic Development Area south of Oxford, to allow an urban extension of at least 4,000 dwellings, and
  - greater flexibility to allow for economic growth in the central Oxfordshire sub-region, including in and adjacent to Oxford.
5. The Secretary of State's response to the Panel Report, and the changes to the SEP proposed therein, are due to be published in early 2008.

6. The Panel's recommendations support the position of the City Council, which has consistently argued for a review of the Oxford Green Belt which should identify the most appropriate location for an urban extension to Oxford, to address Oxford's chronic housing need. The Panel agreed with the City Council that there was limited capacity for supplying development land within Oxford's existing boundaries. They also agreed that an extension to the City would be the most appropriate way of meeting future needs in a way that addresses the jobs-housing imbalance and associated pressure on transport networks, and that maintains Oxford's world class status. The Panel go on to state: *"Our recommendation for an SDA in south Oxford will require new working arrangements to be forged between Oxford City Council and SODC... we hope that previous differences of opinion can be put aside and that joint work can progress on a selective Green Belt Review as part of an [Area Action Plan]."*<sup>1</sup>
7. Despite this, the South Oxfordshire Issues and Options paper states in its introduction: *"As this issue will be determined through the South East Plan we have not included an option for the land south of Oxford in this paper."* As such, no options are included in the paper that would give consultees the opportunity to respond on the issue of a potential urban extension. From the perspective of Oxford City Council, this is clearly an unhelpful approach. A detailed and robust draft response to the Issues and Options paper, which responds to relevant questions set out in the accompanying questionnaire, is therefore put forward for Executive Board to consider.

## **Content**

8. The draft response firstly gives some detailed overarching comments on the South Oxfordshire Core Strategy Issues and Options paper, reflecting the background of the Panel Report, and justifying the City Council's views, along the lines of the preceding paragraphs.
9. The draft response then sets out the City Council's comments resulting from the detailed issues and questions set out in the questionnaire. Key issues dealt with are:
  - Impact of urban extension on options for housing growth and distribution in South Oxfordshire;
  - Request for alternative option on quantum and location of employment growth, to take account of possible employment land allocation as part of urban extension;
  - Cross-border impacts of growth at Didcot, namely increased pressure on the A34 and knock-on implications for proposed Northern Gateway development in Oxford;
  - Support for new 'remote' park and ride sites to improve access to Oxford and help ease congestion;

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<sup>1</sup> Paragraph 22.118 of the South East Plan Examination in Public: Report of the Panel Vol. 1

- Support for options proposing maximum affordable housing provision in the central Oxfordshire sub-region, in light of acute demand for affordable housing in and around Oxford.
10. A brief response is also set out on the Sustainability Appraisal report on the Issues and Options, which comments on the lack of an option for the urban extension from a technical perspective.

### **Consultation**

11. Not applicable.

### **Financial and staffing implications**

12. No staffing or financial implications.

### **The next stages**

16. The response agreed by Executive Board will be formally submitted to South Oxfordshire District Council. SODC are obliged to take account of our and all other valid comments received as they move to preparing their Core Strategy Preferred Options report, due for publication in April 2008, at which stage a further six week consultation will take place. SODC are due to submit their final Core Strategy to the Government in February 2009.

**Name and contact details of author:** Matthew Bates (email mbates@oxford.gov.uk)

**Background papers:** Your Place, Your Future: South Oxfordshire Core Strategy issues and Options Paper. November 2007.

### **Appendix**

Appendix A – South Oxfordshire District Council Core Strategy Issues and Options: Draft Response of Oxford City Council



**South Oxfordshire District Council Core Strategy Issues and Options:  
Response of Oxford City Council**

**Overarching response (whole document)**

Oxford City Council has found South Oxfordshire DC's Issues and Options document to be generally very clear and helpfully set out. There is one significant issue, however, which has been given no serious consideration. The City Council would challenge the soundness of omitting such an important issue and related options from consultation. We refer, of course, to the matter of an urban extension to Oxford.

Following public examination of the South East Plan (the Regional Spatial Strategy for the South East), the Panel of Inspectors considered that an urban extension to Oxford would be required to meet local housing needs in the longer term. They recommend an urban extension of at least 4,000 dwellings, as part of a South Oxford Strategic Development Area (SDA), located within South Oxfordshire District. They also recommend acknowledging that some additional employment land, in addition to safeguarded land in Oxford, may be needed to meet the City's employment needs.

This would inevitably lead to a small-scale, highly focused review of the Oxford Green Belt. The Panel considered there were exceptional circumstances to justify a review, namely:

- Excessive housing affordability ratios, high house prices, and a backlog of housing need in Oxford;
- Excess of jobs in Oxford compared with working population, along with staff recruitment and retention problems;
- Significant potential within nationally important employment sectors;
- Worsening traffic congestion.

The City Council considers that the most sustainable housing growth option is to build houses within or as an urban extension to Oxford, to meet the chronic housing need within the urban area, and ensure sufficient flexibility for managed employment growth. Evidence suggests that housing development within or in close proximity to Oxford is most likely to reduce the need to travel, by allowing more people to live closer to where they work, shop and socialise, which in turn would encourage and facilitate trips by modes other than private motor car.<sup>2</sup>

For these reasons, the City Council **objects** to the approach taken by the document as expressed on page 13: *"As this issue will be determined through the South East*

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<sup>2</sup> See paragraph 22.63 of South East Plan Examination in Public: Report of the Panel Volume 1

*Plan we have not included an option for the land south of Oxford in this paper.*” This fails to reflect possible changes to the draft South East Plan in response to the Panel Report, and unnecessarily reduces the scope of the Issues and Options consultation outcome to inform later stages of Core Strategy development.

The lack of any options on this issue also fails to comply with the spirit of PPS12, as reflected in paragraph 8.3 of the companion guide to PPS12 which states: *“It is vital that authorities encourage a meaningful response based upon a genuine choice of options.”* The exclusion of this option also calls into question conformity of the Initial Sustainability Appraisal with PPS12, which states in “Sustainability Appraisal – Key Considerations (paragraph 3.18), *“The potential direct, indirect and cumulative impacts of different policy options need to be identified and appraised in order to integrate sustainable development objectives in the formulation of policy and to inform decisions on which options should be promoted in local development documents.”*

The City Council endorses the recommendation of the Panel that a joint AAP should be prepared in partnership by South Oxfordshire District Council and Oxford City Council. **We would particularly draw attention to Recommendation 22.3 of the South East Plan Panel Report, which recommends including in the SEP a South Oxford SDA of some 4,000 dwellings subject to more detailed work, and paragraph 22.118 of the report text which states:**

*“Our recommendation for an SDA in south Oxford will require new working arrangements to be forged between Oxford City Council and SODC. We appreciate that SODC have so far fiercely opposed any outward expansion of Oxford into their area, but we hope that previous differences of opinion can be put aside and that joint work can progress on a selective Green Belt review as part of an AAP.”*

The City Council therefore seeks the inclusion of an option which states that South Oxfordshire District Council will work with Oxford City Council on producing a selective Green Belt review as a precursor to an Area Action Plan for the proposed SDA south of Grenoble Road, Oxford, to accommodate a minimum of 4,000 new dwellings, which should be integrated as far as possible with Oxford’s social and economic fabric.

The comments that follow are made in response to specific questions in the Issues and Options Questionnaire.

### **Question 1: Settlement Hierarchy**

**Comment:** The Core Strategy will need to consider the proposed South Oxford SDA in finalising a settlement hierarchy, taking into account existing services and facilities in Oxford. Detailed work on access to services will depend on joint working with the

City Council, but consideration should be made more explicit at Preferred Options stage.

### **Questions 2, 3: Quantum of new housing development**

**Support Option 1b.** Following public examination of the South East Plan, the Panel considered that an urban extension to Oxford (of at least 4,000 dwellings) would be required to meet local housing needs in the longer term. The total number of houses to be delivered in South Oxfordshire should therefore reflect this additional development, if this proves to be in line with modifications to the SEP following the Government's response.

### **Question 4: Quantum of new employment development**

**Do not support Options 2a or 2b. Support an alternative option:** Neither Option 2a nor 2b takes account of possible identification of a strategic employment growth area in the proposed South Oxford SDA. Whilst such a site should equally meet the employment needs of Oxford City, as identified in the Oxford Employment Land Review<sup>3</sup>, this should also be identified in the South Oxfordshire Core Strategy, subject to inclusion of the SDA in the SEP. Location of a site or sites would result from joint working on an AAP relating to the SDA.

### **Question 5: Distribution of new housing development – Central Oxfordshire**

**Support alternative Option 3d:** The South East Plan Panel Report recommends an urban extension to the south of Oxford of at least 4,000 dwellings. These would need to be located within South Oxfordshire District. Therefore suggest an alternative option which states that housing development in central Oxfordshire within the SODC boundary should be focused on the proposed South Oxford SDA, with details of the development, including integration with the City, to be taken forward in a joint Area Action Plan with Oxford City Council. The remaining district allocation, in addition to the SDA, should be located sequentially within the settlement hierarchy (beginning with those higher up), with particular weight afforded to accessibility to employment and services.

### **Question 10: Distribution of new employment development**

**Do not support Options 8a or 8b. Support an alternative option:** The South East Plan Panel Report recognises that some additional employment land, in addition to safeguarded land in Oxford, may be needed to meet the City's employment needs,

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<sup>3</sup> Oxford Employment Land Study, Final Report. Nathaniel Lichfield and Partners. March 2006.

potentially including land immediately adjacent to Oxford<sup>4</sup>. The City Council therefore objects to the lack of an option for some strategic employment growth within the proposed South Oxford SDA. Employment sectors which have a strong synergy with medical and academic research and development industries are generally best located in or near Oxford (i.e. benefits of the 'cluster effect'), and location within or close to the urban centre also provides the best opportunity to reduce car-based travel. Hence focus for growth should be the proposed South Oxford SDA, and in or near the main towns of South Oxfordshire.

### **Question 11: Type of employment**

**Support Option 9a:** The City Council considers it essential that economic development within and adjacent to Oxford specifically builds on Oxford's economic strengths and worldwide reputation for high tech, scientific and medical research, and healthcare and higher education related industry. The Draft South East Plan and Panel Report support this kind of economic growth in the Central Oxfordshire sub-region, whilst supporting a mix of employment opportunities. Whilst it is appropriate to support a good mix of local employment opportunities, the main areas of strategic employment growth, including potentially within an Oxford SDA, should build on existing strengths and economic clusters.

### **Question 13: Didcot**

**Comment:** The City Council is aware that much emphasis is being placed on employment growth at sites such as Harwell and Milton Park. It must be borne in mind that significant employment development is proposed by the City Council at Peartree (Northern Gateway). The City Council is keen to work with SODC and other partners to ensure full, robust and coordinated mitigation of potential transport impacts of employment growth in central Oxfordshire, particularly on the A34 Trunk Road. Green travel planning will be a vital component of this.

### **Question 14: New roads in Didcot**

**Comment:** It is noted that there has been justifiable concern within the Didcot community about increasing traffic congestion, and support for improvements to cycling facilities and bus services, as well as local roads. Whilst some new provision for road access to the new development may be appropriate, there should be a clear and robust emphasis on green travel planning, to incorporate measures such as high quality bus priority routes (particularly to integrate with rail services from Didcot Parkway station, and to nearby employment sites), high quality pedestrian and cycle networks and facilities, and, if viable, car clubs. It follows that improvements to the road network should be planned carefully so as not to encourage avoidable car-

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<sup>4</sup> Recommendation 22.1 & paragraph 22.25, South East Plan Examination in Public: Report of the Panel Volume 1



borne travel, and to give clear emphasis to alternative travel modes. This is particularly important given capacity constraints on the A34 strategic route, and taking into account planned housing and economic growth in and around Oxford.

### **Question 24/25: Transport and accessibility**

#### **Support option for additional park and ride sites to assist access to Oxford:**

The City Council is fully supportive of developing remote Park and Ride sites to serve Oxford. Locating sites close to trip origins helps to reduce the length of car trips, and will potentially reduce pressure on congestion hotspots on the edge of Oxford and beyond.

Fuller analysis of travel patterns in central Oxfordshire, and an assessment of opportunities for bus priority, should give a better idea for search areas for new park and ride sites. Account will need to be taken of the proposed South Oxford SDA, and the potential for new bus services to serve this development that potentially integrate with new park and ride services or sites.

### **Question 26: Affordable housing for towns and villages**

**Support Option 14b:** Oxford City Council has an adopted policy of requiring 50% of housing on sites able to support 10 or more dwellings to be affordable. A coordinated approach of neighbouring districts adopting a similar policy, at least within the central Oxfordshire sub-region, would be beneficial in providing the highest possible levels of much needed affordable housing within the sub-region. This conforms with the objective recommended in the Panel Report that a target of at least 40% of *all* new housing in the central Oxfordshire sub-region should be affordable, taking into account small housing sites which will not trigger affordable housing provision.

### **Question 27: Affordable housing site thresholds**

**Support Option 15b:** Oxford City Council requires affordable housing delivery on any residential site capable of accommodating 10 or more dwellings (and in all cases on sites of 0.25 hectares or more). The aim of the Core Strategy should be to deliver the highest possible number of affordable units, certainly within the central Oxfordshire sub-region, therefore a lower threshold, where viable, should be favoured.

### **Question 28: Tenure of affordable housing**

**Do not support Option 16b:** Lowering of the existing proportion of 75% of new affordable housing to be social rented is unlikely to be justified, given the enormous need for social rented accommodation in the central Oxfordshire sub-region. Most households with unmet housing need are unable to afford even shared ownership of

new build housing. Any change in the split should therefore increase, not decrease, the social rented element of new build dwellings.

### **Questions 43 – 46: Contact details**

**Q43 Name:** Oxford City Council

**Q44 Lead contact:** Matthew Bates (Senior Planner, Planning Policy)

**Q45 Address:** Planning Policy, Oxford City Council, Ramsay House, 10 St Ebbe's Street, Oxford OX1 1PT

**Q46 Email:** [planningpolicy@oxford.gov.uk](mailto:planningpolicy@oxford.gov.uk)

### **Initial Sustainability Appraisal**

Overall the Sustainability Appraisal of the South Oxfordshire Core Strategy is a clear and thorough document dealing with most of the issues facing South Oxfordshire over the Core Strategy period.

However, the SA does not appraise any options regarding the Panel Report's<sup>5</sup> recommendation regarding the development of an urban extension South of Grenoble Road in Oxford (paragraph 22.66 - 22.76). This recommendation, which is for the development of at least 4,000 dwellings, is located within the administrative boundaries of South Oxfordshire.

Therefore, it is imperative that South Oxfordshire develops options and assesses the potential impacts of this urban extension as further omitting this issue in the Core Strategy may jeopardise the soundness of this Development Plan Document later on in the process<sup>6</sup>.

The rejection of any of the options regarding this urban extension should be formally made through the sustainability appraisal process where the environmental, economic and social impacts of those options are adequately assessed.

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<sup>5</sup> South East Plan Examination in Public: Report of the Panel Volume 1 (<http://www.gose.gov.uk/gose/planning/regionalPlanning/southEastPlan/>)

<sup>6</sup> Particularly regarding the Test of Soundness iv, which assesses the conformity of the Spatial Plan against the Regional Spatial Strategy and other relevant documents