

To: City Executive Board

Date: 22nd October 2008

Item No:

Report of: Head of City Development

Title of Report: Response to consultation on the Secretary of State's Proposed Changes to the Draft Regional Spatial Strategy for the South East

Summary and Recommendations

Purpose of report: This report summarises the main Proposed Changes that would affect Oxford, and sets out a suggested response to the key issues.

Key decision? No

Executive lead member: Cllr Ed Turner

Report Approved by: Executive Director for City Regeneration, Mel Barrett

Finance: Chris Kaye

Legal: Jeremy Thomas

Policy Framework: Oxford Local Development Framework

Recommendation: The Board is asked to endorse the comments in the report for forwarding to GOSE as the City Council's response to the Secretary of State's Proposed Changes to the Draft Regional Spatial Strategy for the South East.

Summary

1. The purpose of this report is to consider the City Council's response to the Secretary of State's Proposed Changes to the Draft Regional Spatial Strategy for the South East. The response will be submitted as the formal comments of Oxford City Council.
2. City Executive Board is asked to approve the attached response (Appendix 1) for submission to GOSE.

The South East Plan

3. The Draft South East Plan (Regional Spatial Strategy for the South East) was published in March 2006 and underwent an Examination in Public in November 2006. The Panel Report was published in August 2007. The Secretary of State published her Proposed Changes on 17th July 2008 and it is these proposed changes which this report produces a suggested response to.
4. The South East Plan (SEP) is a planning document. Local Authorities must ensure that their Local Development Frameworks are in general conformity with the policies within the South East Plan. When adopted, the SEP will become part of the development plan covering Oxford.
5. The City Council appeared at the Examination into the SEP in relation to housing and employment issues, including the urban extension to the south of the city.

The response to the Proposed Changes

6. The Proposed Changes include changes to region-wide policies as well as policies relating to the Central Oxfordshire sub region. It was not considered necessary to make comments on the region-wide policies as they are quite overarching and generally acceptable. The proposed response therefore focuses on the Central Oxfordshire policies as these will have more of an impact upon Oxford.
7. The majority of the policies are generally acceptable and support should be noted regarding the emphasis placed on the importance of Oxford in the Central Oxfordshire economy.
8. But there are two key issues of concern. Firstly, the Panel Report of Aug 2007 considered that Peartree as an allocation was important to Oxford's future growth potential and given its size and location would not adversely impact on Bicester or Witney. We therefore consider that the Proposed Changes should have recognised this and should have allocated the land for employment development. Such an allocation in the South East Plan significantly strengthens our case for employment development at the Northern Gateway.
9. Secondly, the Panel Report suggested that the urban extension to the south of Oxford should be delivered through a Development Plan Document (DPD) produced jointly by Oxford City Council and South Oxfordshire District Council. Disappointingly, the Proposed Changes do not specifically endorse the use of a joint DPD but refer to the Local Authorities "working collaboratively". We consider this to significantly weaken our position as it could allow South Oxfordshire District Council to continue without the full involvement of the City Council despite the urban extension needing to function as part of Oxford. There would be a danger that the urban extension would not be fully integrated into Oxford.

10. Appendix 1 suggests the formal response on these issues.

The timetable

11. Once approved by Executive Board, the response will be submitted to the Secretary of State by the deadline of Friday 24th October 2008. The Government will then consider the responses to the consultation and make any necessary amendments, before publishing the final adopted South East Plan. There is no formal timetable set out for adoption, however publication of the final SEP is expected in early 2009, at which point the SEP will become the Regional Spatial Strategy (RSS) for the South East. At this point the SEP will replace the existing RPG 9 – Regional Planning Guidance for the South East, and will also supersede the Oxfordshire Structure Plan 2011. As part of the Development Plan, the adopted SEP will be the starting point for planning decisions, along with Local Development Frameworks prepared at the district level.

Recommendation

12. The Board is asked to endorse the comments in the report for forwarding to GOSE as the City Council's response to the Secretary of State's Proposed Changes to the Draft Regional Spatial Strategy for the South East.

Name and contact details of author: Laura Goddard
lgoddard@oxford.gov.uk 01865 252173

Appendix: Official comment form setting out suggested formal response of Oxford City Council to GOSE

Background papers: Secretary of State's Proposed Changes to the Draft Regional Spatial Strategy for the South East

Version number: 2



**GOVERNMENT OFFICE
FOR THE SOUTH EAST**

Draft South East Plan Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

If you wish to comment on the Proposed Changes to the Draft South East Plan please:

- Complete all relevant details in Section A – this need only be done once irrespective of how many parts of the RSS you wish to comment on.
- Complete a separate page 2 of the form for each part of the RSS you wish to comment on. Ensure you insert your organisation name (or surname if responding as an individual) on each page 2 and complete Sections B, C & D. You may make copies of this form.
- Type or print clearly in black ink.
- Note that all comment forms will be made available for the public to read – they cannot be treated as confidential.
- E-mail or post (please do not send duplicates) the completed forms to be received by the Government Office for the South East before **5.00pm on Friday 24 October 2008**.
- Alternatively an electronic consultation form is available at www.gose.gsi.gov.uk/planning/regionalPlanning

Please send all responses to:

Regional Spatial Strategy Team
Government Office for the South East
Bridge House
1 Walnut Tree Close
Guildford, GU1 4GA

E-Mail: rss@gose.gsi.gov.uk

Telephone: 01483 882532

Fax: 01483 882489

Section A

Comments submitted by:		Agent (if applicable):	
Organisation	Oxford City Council	Organisation	
Surname	Jaggard	Surname	
Title/first name	Mark	Title/first name	
Address Line 1	Ramsay House	Address Line 1	
Address Line 2	10 St Ebbes St	Address Line 2	
Address Line 3	Oxford	Address Line 3	
Postcode	OX1 1PT	Postcode	
E-Mail	mjaggard@oxford.gov.uk	E-Mail	
Tel. (day)	01865 252161	Tel. (day)	
Fax	01865 252144	Fax	

To ensure your comments are taken into account this form must be completed and received by 5.00pm on Friday 24 October 2008.

Signature..... Date.....

Would you like to be notified of the publication of the final South East Plan?
(Copies will be available to purchase from the Stationery Office, and will be available to download free of charge from the Government Office Website)

Comments from (organisation, or surname).....Oxford City Council

Section B

Support / oppose/ comment (please specify)	Support
Proposed Change Number (e.g. Chap 1 (01))	Chap. 22 (5)
Paragraph No. - for comments on Sustainability Appraisal/Habitats Regulation Assessment Report	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

We support the emphasis given to the importance of Oxford within the Central Oxfordshire economy

Section D1

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

The South East Plan is supportive of Oxford's key role within the Central Oxfordshire sub-region. It recognises Oxford's key role as a city region with Oxford providing higher order services, such as retail, health, and education, for the surrounding area. Amongst the key challenges for the sub-region is to nurture the future success of Oxford whilst protecting its historic character and setting. It encourages the spatial advantages of the sub-region, such as the 'Oxford to Cambridge Arc' initiative, the East-West rail link and existing and or new employment clusters, which need to be seized. In this context Oxford itself will be allowed to grow physically and economically in order to accommodate its own needs, contribute to those in the wider region and help maintain its world-class status.

Section D2

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

n/a

Comments from (organisation, or surname).....Oxford City Council

Section B

Support / oppose/ comment (please specify)	Oppose
Proposed Change Number (e.g. Chap 1 (01))	Chap. 22 (5)
Paragraph No. - for comments on Sustainability Appraisal/Habitats Regulation Assessment Report	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

With regards to allocating new land for employment, the approach adopted by the Panel should be supported, in recognition of the importance of providing additional new employment land for Oxford. The Panel considered that Peartree, as an allocation, was important to Oxford's future growth potential.

Section D1

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

The Panel Report considered the evidence set out in Oxford's Employment Land Study which concluded that having tested a range of options the safeguarded land on the northern edge of the city would largely meet the lower end of the projected need. From this evidence the Panel were "*persuaded that some new employment land could be required within Oxford to avoid undue constraint on economic potential there*" (Panel Report para 22.21). The Panel therefore recommended that the policy should be amended to "*acknowledge that some new employment land, in addition to the safeguarded land [Peartree/Northern Gateway] may be needed*" (Panel Report para 22.25). We consider that the approach adopted by the Panel should be supported, in recognition of the importance of providing additional new employment land for Oxford.

The Proposed Changes consider that the spatial options for allocating additional land should be a matter for local determination and should not adversely affect the future economic buoyancy of Bicester or Witney or the proposed SDA South of Oxford. Both Bicester and Witney are market towns with a broader rural catchment area. Whilst Bicester does not have a market profile for high-tech activity it does have significant land available to accommodate any future need. The Panel recognised that in the case of Oxford, further releases of employment land, in addition to the safeguarded land at Peartree (Northern Gateway), could be adversely competitive. In other words, Peartree as an allocation is important to Oxford's future growth potential and given its size and location would not adversely impact on Bicester or Witney. We therefore consider that, in relation to Peartree, the Plan should be more positive for Oxford and support the approach taken by the Panel. The Proposed Change in Chap.22 (3) says "*Oxford itself will be allowed to grow physically and economically...*" and new policy CO2 refers to using former safeguarded land. The addition of Peartree as a recognised employment site will support those elements of the Plan. Furthermore we consider the allocation of the safeguarded land at Peartree would not adversely affect any future employment development in the SDA.

Section D2

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

~~Suggest the following amendments to third paragraph of Chap. 22 (5), fourth sentence: "Options regarding the location, level and form of employment development, including the possible use of the currently safeguarded land at Peartree, will be a matter for local determination. Land should not be released for employment to the north of Oxford that could adversely affect the future buoyancy of Bicester and Witney or undermine opportunities to integrate the South Oxford urban extension to the wider southern urban area. The currently Safeguarded Land at Peartree should be promoted for employment development.~~

Comments from (organisation, or surname).....Oxford City Council

Section B

Support / oppose/ comment (please specify)	Oppose
Proposed Change Number (e.g. Chap 1 (01))	Chap. 22 (9)
Paragraph No. - for comments on Sustainability Appraisal/Habitats Regulation Assessment Report	

Section C

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

Reference should be made to the production of a joint DPD to progress the South Oxford urban extension (Strategic Development Area – SDA).

Section D1

If you wish to expand your response please use the space below, and attach additional sheets if necessary with your name on.

It is disappointing that the Proposed Changes weakens the role of Oxford City Council with regards to the development of the SDA. The Panel Report was stronger in this respect by saying that a joint DPD should be developed between Oxford City Council and South Oxfordshire District Council.

South Oxfordshire DC, whilst against the urban extension in principle, propose to progress it through a policy in their Core Strategy and then an SPD however we understand that they would prefer not to progress it at all. The Proposed Changes would allow South Oxfordshire to progress in this manner without adequate involvement of Oxford City Council. Despite being within South Oxfordshire's administrative area, the urban extension would be an extension to Oxford and would function as part of Oxford. New residents would use its bus services, leisure and cultural facilities, shopping and employment among other things. It is therefore critical that Oxford City Council have as much involvement in the process as possible to ensure it is as well integrated as possible.

There are many issues which would be specific to this development and that could not necessarily rely upon overarching Core Strategy policies to ensure adequate provision for infrastructure and facilities. There would be too many issues to explore adequately within an SPD that should specifically relate to the urban extension. We consider that having policies in a joint DPD would ensure that the urban extension was properly integrated within Oxford; the most appropriate land uses were delivered; site specific requirements were delivered; delivery of the various phases was managed appropriately and that infrastructure was delivered at the appropriate stage.

Section D2

If you are suggesting changes to the draft plan please supply revised wording of policies or supporting text as you wish to see them:

Suggest the following amendments in final paragraph of Chap. 22 (9), second sentence: “The review and any subsequent plan-making will be carried out ~~collaboratively by~~ through a joint DPD between Oxford City Council and South Oxfordshire District Council to an expeditious timetable ~~and in a form~~ to be agreed by the Government Office for the South East”