

To: City Executive Board

Date: 20th May 2009

Item No:

Report of: Head of City Development

Title of Report: City Council's response to the consultation on South Oxfordshire District Council's Core Strategy Preferred Options

Summary and Recommendations

Purpose of report: To endorse the City Council's response to South Oxfordshire District Council's Core Strategy Preferred Options document

Key decision? No

Executive lead member: Councillors Turner and Cook

Report Approved by:

Executive Director: Mel Barrett

Finance: Chris Kaye

Legal: Jeremy Thomas

Environmental Development: John Copley

Property and Facilities Management: Steve Sprason

Policy Framework: More housing, better housing for all

Recommendation(s): That the City Executive Board endorses Appendix 4 to this report as the City Council's formal response to South Oxfordshire District Council's consultation on their Core Strategy Preferred Options document.

Background

1. South Oxfordshire District Council (SODC) published their Core Strategy Preferred Options (CSPO) document for public consultation from 20th March until 1st May 2009.
2. The timing of City Executive Boards meant it was not possible to bring the City Council's response to CEB prior to the end of the consultation period. To ensure SODC received a response from the City Council within the

valid consultation period, comments were sent to SODC, having been agreed with the Planning Policy Members Steering Group, but with the caveat that it was subject to formal agreement at this meeting.

Officer comment

3. The CSPO sets out options for overarching policies for South Oxfordshire as well as specific development based around the towns. Most relevant to Oxford, it also includes a strategy for the South of Oxford Strategic Development Area (SDA) otherwise known as the land south of Grenoble Road.
4. The SDA was proposed as an inclusion in the South East Plan by the Secretary of State (SoS). The final adopted South East Plan is expected from the SoS imminently so a verbal update of its content regarding the SDA will be given at CEB.
5. SODC continue to object to the SDA but they have reluctantly included a preferred strategy for bringing the SDA forward to development. SODC's preferred strategy for the SDA is replicated at Appendix 1. Appendix 2 replicates their proposed new Green Belt boundary. Appendix 3 shows the four areas assessed in their Landscape Assessment.
6. In our consultation response, I consider that the following points (in document order) should be raised:
 - (a) It is interesting and somewhat contradictory that the CSPO is opposed to reviewing the Green Belt around South Oxford whilst at the same time recognising the benefits that a Green Belt review can bring to Wheatley and Berinsfield.
 - (b) We are keen to work with SODC in delivering a well-planned and well-integrated urban extension to benefit both districts.
 - (c) The preferred strategy for the SDA is vague and SODC intend to deliver it through a subsequent Supplementary Planning Document (SPD). We are not convinced that this Core Strategy preferred approach could adequately guide an SPD and we object to the fact that there would be no joint AAP for the urban extension. A joint AAP would significantly help to integrate the urban extension with Oxford as well as building on our knowledge of the local area and facilitating the regeneration of the Leys area.
 - (d) The strategy for Didcot looks at its issues in a positive way by considering the strengths and opportunities of the area and how new development could meet particular needs. In contrast, the SDA is treated in the opposite fashion and focuses on the constraints to development and fails to draw on the positives that the SDA could bring, not least in contributing to much needed affordable housing.

- (e) The four areas considered for development by SODC (See Appendix 3) were assessed in terms of their impact upon the landscape, however they were not individually assessed on their planning merits against social, environmental and economic issues which we consider to be a major flaw. The CSPO also fails to explain or justify why Area A (not owned by the City Council) has been omitted, having been included when the document was taken to SODC's Cabinet meeting.
- (f) SODC have only assessed the land required for the urban extension to include 4,000 houses (and ancillary facilities) but the requirement of the South East Plan Proposed Changes is to go further than this. SODC should also assess boundaries for additional safeguarded land to show how the boundary will endure over the long term to avoid piecemeal development. The Preferred Options fails to do so and is therefore not in conformity with the SEP Proposed Changes.
- (g) There is no adequate assessment of access points to integrate the development into Oxford meaning we are unclear how the SDA would be integrated.
- (h) The Oxford Science Park is adjacent to the SDA, so if we are to plan for the long-term economy of Central Oxfordshire, the CSPO would be an ideal opportunity to consider the merits of such an allocation here.
- (i) Urban extensions provide an excellent opportunity to deliver very sustainable developments. There is an opportunity here to explore the delivery of an SDA with very positive eco-credentials. In contrast, the preferred strategy seems very weak in this respect.
- (j) We consider that there is opportunity to integrate the SDA with a wider revised transport strategy for Oxford and the Central Oxfordshire sub-region which, combined with demand management measures and appropriate mix and co-location of uses in the SDA, would significantly reduce additional pressure on the transport network.
- (k) We are keen to work with SODC and other partners to make the most of the opportunities presented by the SDA for sustainable transport solutions.

7. Paragraph 6 is a summary of our response but the full response is at Appendix 4.

Climate change

8. As this report is responding to South Oxfordshire District Council's consultation document, it has no differential impact upon climate change. An urban extension to Oxford is the most sustainable location for new housing development of this scale. It is hoped that the new development would seek very positive eco-credentials.

Equalities

9. As this report is responding to South Oxfordshire District Council's consultation document, it has no differential impact upon equality issues.

Financial implications

10. As this report is responding to South Oxfordshire District Council's consultation document, there are no direct financial implications.

Legal implications

11. As this report is responding to South Oxfordshire District Council's consultation document, there are no direct legal implications.

Risk analysis

12. A risk assessment has been undertaken and the risk register is attached at Appendix 5. All risks have been mitigated to an acceptable level.

Conclusion

13. Appendix 1 replicates SODC's preferred strategy for the SDA. The full text can be viewed at www.southoxon.gov.uk/corestrategy

14. Appendix 2 replicates SODC's preferred option for the new Green Belt boundary.

15. Appendix 3 shows the four areas assessed in SODC's Landscape Assessment.

16. Appendix 4 shows the full text of our response to SODC's consultation.

17. Appendix 5 shows the risk register.

Recommendation

18. That the City Executive Board endorses Appendix 4 to this report as the City Council's formal response to South Oxfordshire District Council's consultation on their Core Strategy Preferred Options document.

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Background papers: none

Version number: 6

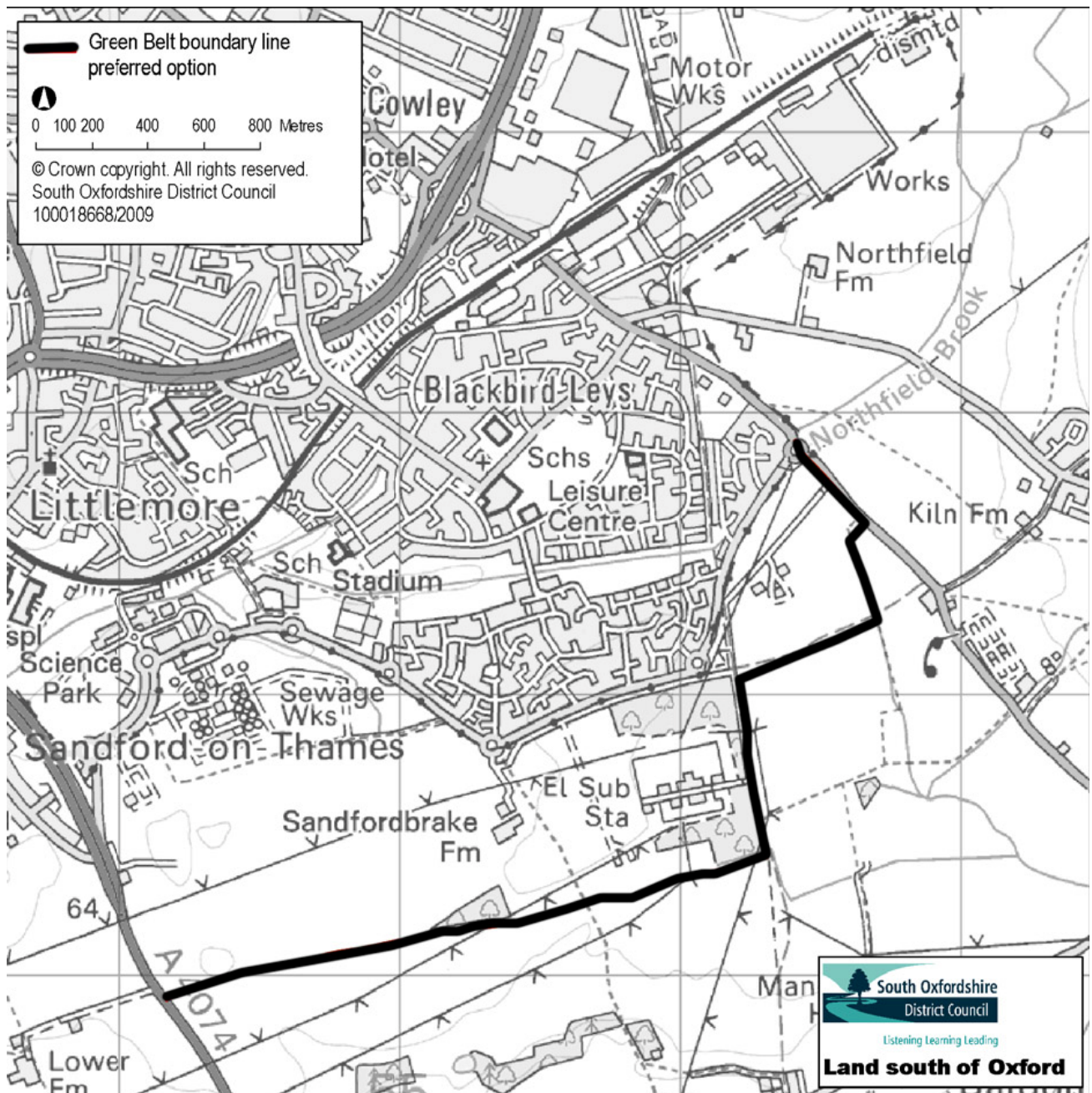
South Oxfordshire District Council's Preferred Strategy for the strategic development area South of Oxford

Replicated from South Oxfordshire District Council's Core Strategy:

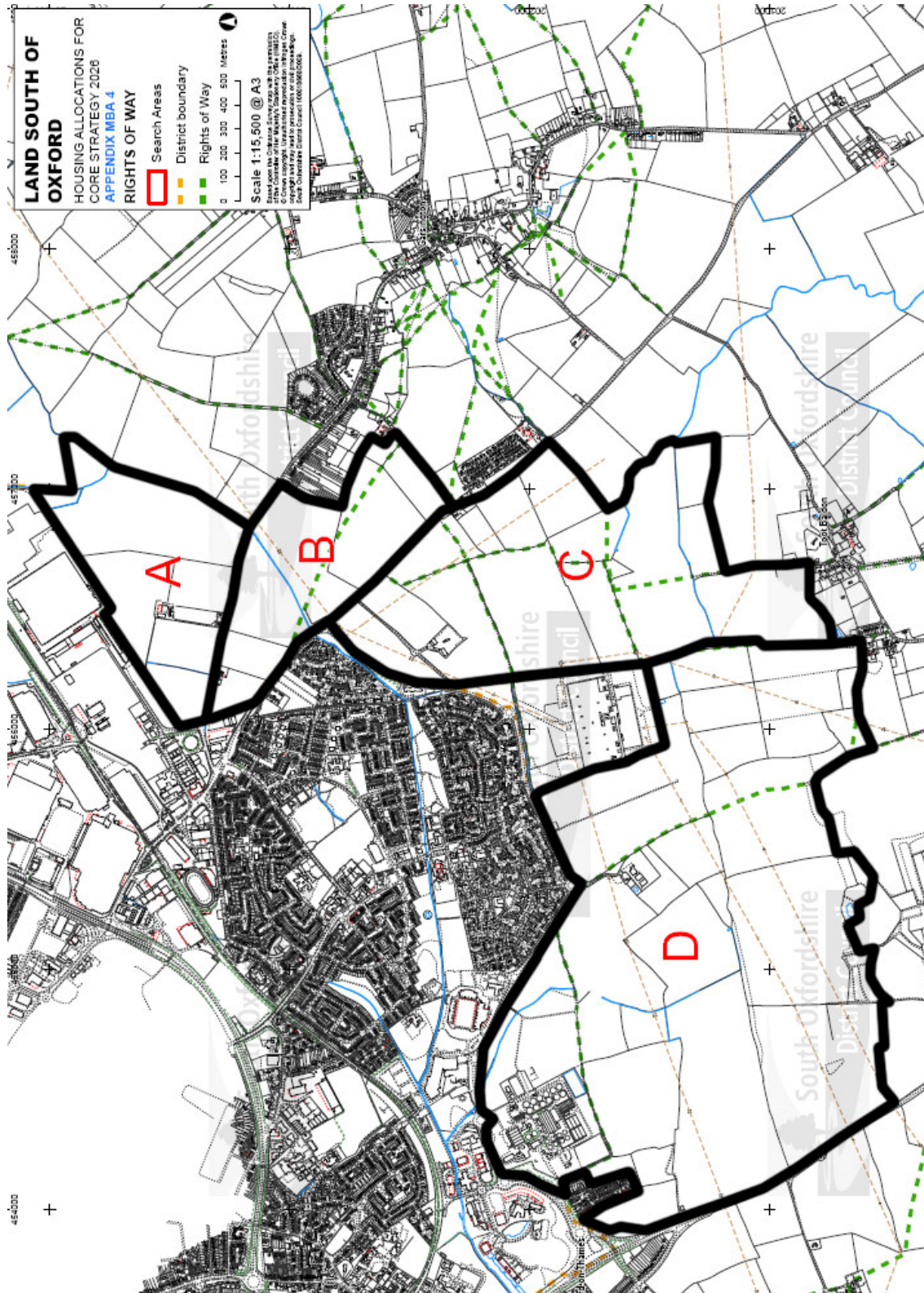
"If the proposal for a green belt review and an urban extension south of Oxford is contained in the South East Plan and if the transport assessment work shows that this development can be accommodated without unacceptable impacts on the transport network, our preferred strategy is:

- *to revise the green belt boundary to that shown on Map 18.2*
- *to allocate land for an urban extension to Oxford containing:*
 - *up to 4,000 houses*
 - *the infrastructure and services required by the development*
 - *relocation of the sewage treatment works*
 - *a significant area of landscaping on the edge of the development*
 - *the retention of the park homes site and the gypsy and traveller site*
- *to seek further advice from Oxfordshire County Council as highway authority on the transport impacts and mitigation measures needed*
- *to work with Oxford City Council on measures to integrate development with the City."*

South Oxfordshire District Council's preferred option for Green Belt boundary review



The four areas assessed in South Oxfordshire District Council's South of Oxford Landscape Assessment



Proposed formal response to South Oxfordshire District Council's Core Strategy Preferred Options

Comment number	Part of Preferred Options	Comment
1	<p>Paragraph 7.29 Rest of Central Oxfordshire</p>	<p>It is interesting, and somewhat contradictory, that the Preferred Options is opposed to reviewing the Green Belt around South Oxford whilst at the same time recognising the benefits that a review can bring to Wheatley and Berinsfield.</p> <p>Despite the Preferred Options attempting to make a distinction between the review around South Oxford from those at Wheatley and Berinsfield, the reasons given for the review around Berinsfield could easily be applied to the review around South Oxford.</p> <p>One of the reasons given by SODC for taking some land out of the Green Belt around Wheatley is because it "<i>would be helpful</i>" to allow the area to prosper. Similarly, reviewing the Green Belt boundary around South Oxford would be extremely 'helpful' in addressing housing need and aiding the regeneration and prosperity of the Blackbird Leys area.</p>
2	<p>Paragraphs 7.29 and 7.30 Rest of Central Oxfordshire</p>	<p>The Preferred Options includes a review of the Green Belt around Wheatley and Berinsfield justified by the fact that they "<i>are small-scale and address local needs and priorities</i>" and that such reviews are supported in the emerging South East Plan. This paragraph insinuates that the review at South Oxford is a 'strategic' review of the Green Belt and is not supported by the emerging South East Plan because it is different to a 'local' review. In fact, a 'strategic' review would be a review encompassing the whole of the Oxford Green Belt, which is made clear in paragraph 22.19 of the SoS Proposed Changes (companion document) when it says that a "<i>strategic review appears to be unnecessary</i>", but that a focussed review around the South of Oxford is. The wording of the Preferred Options is therefore misleading by implying that the Green Belt review at South Oxford would be a strategic review when, in Green Belt terms, it is not.</p>
3	<p>Section 18 South of Oxford Urban Extension</p>	<p>We wish to express that we are keen to work with SODC in delivering a well-planned and well-integrated urban extension to benefit both districts. Our Core Strategy emphasises our desire to work constructively with SODC to take forward the SDA in the context of wider regeneration opportunities in the local area.</p>

<p>4</p>	<p>Section 18 South of Oxford Urban Extension – delivery and implementation</p>	<p>The Secretary of State’s Proposed Changes to the SEP state that “[Oxford City and SODC LDFs]...will contain such detail as is necessary to show where, how and when the component parts of the SDA, including the housing, will be delivered. The relevant plans will also take account of the opportunities the urban extension may present as a catalyst for the regeneration of The Leys area, and how best to integrate the new development into the wider city”. (paragraph 22.20 of the Companion Document). We consider that the Core Strategy fails to consider the options and opportunities for achieving these aims.</p> <p>Judging by SODC’s LDS timetable, the intention is to include a policy within the Core Strategy dealing with the SDA and then moving straight to an SPD. A Core Strategy preferred approach, that is intended to guide that SPD, would need to have much more information in it that is currently set out. It is appreciated that this is a preferred options document and not the proposed submission but we do not consider that the option has sufficient detail for us to judge whether the best approach is being taken to integrate the urban extension with Oxford nor do we consider that such an approach could adequately guide an SPD.</p> <p>Our point can be emphasised by comparing SODC’s approach to dealing with South Oxford SDA with that of their approach to Didcot.</p> <p>Didcot will be delivered by a policy in the Core Strategy followed by an AAP. The preferred strategy and supporting text for Didcot includes considerable detail (movement corridors, green infrastructure, indicative road network and highway infrastructure improvements in the surrounding area) and also has the benefit of a specific background paper bringing together all the planning issues - and will still be delivered through an AAP. It is therefore surprising that the South Oxford preferred strategy which is, in our opinion, lacking in detail, is only to be delivered through an SPD. We are not convinced that this Core Strategy preferred approach could adequately guide an SPD and we therefore object to the fact that there would be no AAP for the urban extension. Furthermore, a joint AAP between SODC and Oxford City Council would demonstrate good planning in significantly helping to integrate the urban extension with Blackbird Leys, Greater Leys, Littlemore and Cowley as well as building on our knowledge of the local area and facilitating the regeneration of the Leys area.</p> <p>We accept that GOSE have approved the LDS but that was in the absence of knowing what detail was in the Core Strategy preferred options. There is not enough detail within the preferred options and we reiterate our objection to there not being a joint AAP.</p>
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<p>5</p>	<p>Section 18 South of Oxford Urban Extension – overall approach</p>	<p>Looking at the detail, there is a significant difference between the approach taken to exploring options for the SDA compared to that for Didcot. We consider that a similar approach to Didcot is necessary in order to properly plan the SDA.</p> <p>The Didcot strategy (and to some degree the Henley, Thame and Wallingford strategies too) looks at the issues in a positive way by considering the strengths and opportunities of the area and how new development could meet particular needs. However, the South Oxford SDA is treated in the opposite fashion and focuses on the constraints to development and fails to draw on the positives that the SDA could bring, not least in contributing to much needed affordable housing. In this respect the preferred options does not present a fair and balanced planning framework. A fair planning framework would aid delivery.</p> <p>We consider that the approach which has been taken to date in assessing the constraints and their potential impacts is both simplistic, generic and high level in nature. A more detailed examination of the issues, and of the positive opportunities presented by the SDA, potentially by the preparation of an AAP, might well yield a more positive and balanced response. Indeed, we expect that many of these constraints could be successfully overcome or ameliorated at the detailed planning stage.</p>
<p>6</p>	<p>Section 18 South of Oxford Urban Extension - direction and amount of growth</p>	<p>The Didcot strategy looks at the different options for where growth would be most appropriate, however, the SDA strategy does not go into as much detail. The four areas considered (as shown in the South of Oxford Landscape Assessment) are assessed in terms of their impact upon the landscape but they are not individually assessed as part of the Preferred Options in terms of their planning merits. There is no site assessment like there is for Didcot, Wallingford, Henley and Thame. This is a fundamental omission as each site should be assessed on how they achieve against all social, environmental and economic issues.</p> <p>Paragraph 18.10 of the Preferred Options says that (as well as landscape and existing structures) the land was assessed against ‘<i>access points onto the existing road network</i>’ and ‘<i>the ease with which the new development can be integrated into existing communities</i>’ but the information on these assessments does not appear to be available. There is a general comment on access in the Transport Assessment but nothing of detail. It is therefore impossible to form an opinion regarding which are most suitable areas. It is also unclear how these assessments influenced the proposed boundary and with the current information it appears as though solely landscape issues have been used to determine the extent of the ‘suitable’ area.</p> <p>The Preferred Options fails to explain why the area adjacent to the gasometer (majority of Area A in the Landscape Assessment (Appendix 3)) has been omitted. We note that it was included when it was taken to Cabinet but the subsequent removal has not been explained or justified in the Preferred Options.</p>

7	<p>Section 18 South of Oxford Urban Extension – safeguarded land boundaries</p>	<p>The Secretary of State's Proposed Changes to the SEP state that "<i>The boundaries of the revised Green Belt, Strategic Development Area, and any additional safeguarded land necessary to ensure the new boundaries endure over the long term, will be shown in relevant parts of the Oxford City and South Oxfordshire Local Development Frameworks</i>". (paragraph 22.20 of the Companion Document).</p> <p>The Preferred Options suggests (paragraph 18.10) that SODC have only assessed the land required for the urban extension to include 4,000 houses, however, the requirement of the SEP Proposed Changes is to go further than this. Not only should SODC assess boundaries for the revised Green Belt and SDA, they should also assess boundaries for additional safeguarded land. The Preferred Options fails to do so and fails to show how the boundary will endure over the long term and is therefore not in conformity with the SEP Proposed Changes. Identifying safeguarded land would avoid piecemeal development in the future.</p>
8	<p>Section 18 South of Oxford Urban Extension – Sustainability Appraisal</p>	<p>It is surprising that the SA concludes that providing more than 4,000 houses (Option C) has a minor negative effect on SA Objective #1 (To help provide existing residents with the opportunity to live in a decent home). This is reasoned by assuming that the 4,000+ houses would need to fit into the same area as the original 4,000 houses and thus creating a more compact development with a worse living environment and less opportunity for green infrastructure etc.</p> <p>But, if Option C were taken forward as the Preferred Option, an amendment of the strategy and land-use priorities (and reconsidering the suitability of area including Area A east of the gasometer) might lead to finding enough extra land to accommodate 4,000+ dwellings without creating a poor living environment and thus achieving a 'major positive' score against SA Objective #1.</p> <p>Because the assumption has been made that more than 4,000 houses means accommodating them into the area identified for only 4,000, this has led to the SA to conclude that there would be negative or uncertain effects from Option C against SA Objectives 3 and 8, as well as 1.</p>
9	<p>Section 18 South of Oxford Urban Extension – linkages and access</p>	<p>As mentioned above, there seems to be no adequate assessment of access points to integrate the development into Oxford leading us to be unclear how the SDA would be integrated.</p> <p>If confirmed, the SDA would be need to endure over the long-term and Oxford City Council are keen to consider innovative ways and perhaps fundamental changes of the existing urban fabric in order to integrate the development with Oxford. It is therefore disappointing that the only mention of access and integration is in the Transport Assessment and Landscape Assessment that do nothing more that describe the current situation. The Landscape Assessment, when considering footpath linkages, states "<i>The difficulty arises when attempting to provide permeability or movement through or into the existing urban structure where none exists</i>" (para 2.6.1) and then doesn't consider it further. Oxford City Council would want to work with SODC to explore what opportunities exist.</p> <p>The Landscape Assessment also states that "<i>Given that the sites are a considerable distance to Oxford city centre, there is no comment on direct footpath links to the city centre</i>". It is disappointing that footpath links to Cowley and Blackbird Leys District Centres are not referred to.</p>

10	<p>Section 18 South of Oxford Urban Extension – Employment</p>	<p>We consider that paragraph 18.25 misrepresents what the City Council has expressed in our Core Strategy about employment land in the SDA. Our Proposed Submission Core Strategy (and Proposed Changes to the Submission Core Strategy) states “<i>the South Oxford SDA offers the only suitable opportunity for some further employment land</i>”. This wording is meant to be recognition of the opportunity rather than a reliance on it. We appreciate that the SoS Proposed Changes to the SEP does not commit either way to employment within the SDA, however, Policy CO4 proposes the Green Belt review in order to “<i>facilitate a sustainable urban extension</i>”. To deliver a <u>sustainable</u> urban extension, would mean, by definition, a development of mixed uses that could include employment.</p> <p>As recognised in the SODC Preferred Options at para 18.24, the Oxford Science Park is adjacent to the SDA so to plan for the long-term economy of Central Oxfordshire, the Preferred Options would be an ideal opportunity to consider the merits of such an allocation here. The Employment Land Study for Oxford (Nathaniel Lichfield, March 2006) considered that an option for long-term employment growth could be expansion of the Oxford Science Park into the urban extension.</p> <p>Due to the lack of detail in the preferred strategy there is no clarification of employment opportunities that are fundamental to a sustainable urban extension.</p>
11	<p>Section 18 and Paragraph 10.17 Sustainable design</p>	<p>Urban extensions provide an excellent opportunity to deliver very sustainable developments. There is an opportunity here to explore the delivery an SDA with very positive eco-credentials. In contrast, the preferred strategy for urban extensions on page 86, and the absence of a reference in Section 18, seem very weak in this respect.</p>
12	<p>Paragraph 18.30 SDA Traffic and Transport</p>	<p>We agree that development will need to be planned in a way that reduces the need for car travel - demand management can work well as demonstrated by the sustainable travel patterns apparent in Oxford. The location of the SDA on the edge of Oxford in itself is likely to result in lower average trip distances compared with alternative locations for housing.</p>
13	<p>Paragraphs 18.32-35 SDA Traffic and Transport</p>	<p>The preliminary modelling has shown that the major draw for SDA occupiers will be Oxford. This provides particular opportunities for achieving high modal share by public transport and cycling.</p>
14	<p>Paragraphs 18.32-34 SDA Traffic and Transport</p>	<p>The analysis does not reflect the significant impact that carefully thought out masterplanning and mitigation is likely to have on travel behaviour for the SDA - these aspects have not yet been modelled. We consider there is opportunity to integrate the SDA with a wider revised transport strategy for Oxford and the central Oxon sub-region, which combined with demand management measures, and appropriate mix and co-location of uses in the SDA, would significantly reduce additional pressure on the transport network.</p>
15	<p>Paragraphs 18.30-35 SDA Traffic and Transport</p>	<p>We are keen to work with SODC and other partners to make the most of the opportunities presented by the SDA for sustainable transport solutions.</p>

Risk Register

Risk Score **Impact Score:** 1 =Insignificant; 2 = Minor; 3 = Moderate; 4 = Major; 5 = Catastrophic **Probability Score:** 1 = Rare; 2 = Unlikely; 3 = Possible; 4 = Likely; 5 = Almost Certain

No.	Risk Description Link to Corporate Obj	Gross Risk		Cause of Risk	Mitigation	Net Risk		Further Management of Risk: Transfer/Accept/Reduce/Avoid		Monitoring Effectiveness				Current Risk	
		I	P			I	P	Action:	Outcome required:	Q 1	Q 2	Q 3	Q 4	I	P
					Mitigating Control: Level of Effectiveness: (HML)			Action: Action Owner:	Outcome required: Milestone Date:	⊗	⊗	⊗	⊗		
								Mitigating Control: Control Owner:		⊖	⊖	⊖	⊖		
										⊕	⊕	⊕	⊕		
1	May increase tensions between SODC and the City Council which may lead to negative press reports (Stronger and more inclusive communities)	2	2	Submitting Appendix 4 as the formal City Council comments on SODC's Core Strategy	Mitigating Control: none Level of Effectiveness: n/a	2	2	Action: Accept Action Owner: Michael Crofton-Briggs Mitigating Control: Control Owner:	Outcome required: Milestone Date:						
2	Suggesting that the urban extension should have positive eco-credentials may reduce the return from the development of Oxford City Council's land (Transform Oxford City Council by improving value for money and service performance)	2	3	Submitting Appendix 4 as the formal City Council comments on SODC's Core Strategy	Mitigating Control: consider additional costs when undertaking financial viability testing Level of Effectiveness: M	1	3	Action: Reduce Action Owner: Michael Crofton-Briggs Mitigating Control: Consider additional costs when undertaking financial viability testing Control Owner: Steve Sprason	Outcome required: Minimise impact upon return from development Milestone Date: n/a						