
Proposed Modifications to South Oxford Local Plan

1. The City Council prepared statements and presented evidence at the Examination in relation to housing numbers and the three strategic site allocations adjacent to Oxford, which comprised proposed developments at Grenoble Road (STRAT 11), Land at Northfield (STRAT 12) and Land north of Bayswater Brook (STRAT 13).
2. Whilst the Council fully support the Inspectors recommendations in principle for these policies these representations set out where Oxford City Council consider additional modifications are considered necessary to make the plan sound.

Housing numbers (STRAT 2)

3. Whilst there is a reference in the monitoring framework of the Plan to the start date for Oxford's unmet housing needs it appears to have been removed from the amended version of Policy STRAT 2 and should be re-instated. No reason was provided in CSD13 for this change. The Examination Statement was clear that the stepped trajectory was still counting the unmet need from **2021** as agreed in the Memorandum of Understanding and Statement of Common Ground between the City Council and South Oxfordshire District Council. However the clarity has been lost in the policy drafting put forward at the start of the hearings (CSD13).
4. As drafted it is unclear the date from which the Oxford unmet housing need applies in STRAT2. This ambiguity means the policy could be read to assume it applies from 2011. The City Council consider that it would not be sound to count it from the start of the South Oxfordshire Local Plan period as it would not be justified by the evidence base relating to Oxford's unmet needs. The now adopted Oxford Local Plan 2036 period starts in 2016 so it would predate our

plan period and undermine the argument made by the City Council for not having to deliver it by 2031. The reason it is justified to apply from 2021, post adoption, is that the sites that will contribute to Oxford's unmet need are in the green belt and will only be released upon adoption of this local plan. As set out by South Oxfordshire District Council in their evidence base the sites location on the edge of Oxford are an important component in their ability to accommodate Oxford's unmet needs.

5. The City Council is therefore asking for the clarity that was there when the plan was submitted for examination, to be put back into Policy STRAT2. There seems no justification as to why it is being removed. We have summarised below how STRAT 2 would read with this modification.

South Oxfordshire Housing Requirement- 18,600 between 1 April 2011 and 31 March 2035 ~~South Oxfordshire Housing Requirement 775 homes per year (17,825 between 1 April 2011 and 31 March 2034)~~

• **4,950 homes addressing Oxford's unmet housing need between 1 April 2021 and 31 March 2035** ~~Addressing Oxford's contribution to the Growth Deal 495 home per year (4,950 between 1 April 2021 and 31 March 2031)~~

• **Total housing requirement for the plan period 23,550 homes** ~~Total housing requirement for the plan period 22,775 homes~~

The annual requirement is as follows:

- **2011/12 to 2025/26 - 900 homes per annum.**
- **2026/27 to 2031/32 -1,120 homes per annum**
- **2032/33 to 2034/35 - 1,130 homes per annum.**

Three strategic sites close to Oxford and their potential regeneration benefits

6. The City Council provided evidence in statements and presented evidence at the Examination which supported the case being made by South Oxfordshire that there were 'local' exceptional circumstances for releasing the three strategic site allocations, close to Oxford, from the Green Belt. Amongst the reasons put forward was the regeneration benefits that the development of Land South of

Grenoble Road (STRAT11), Land at Northfield (STRAT 12) and Land north of Bayswater Brook (STRAT 13) would bring to the local area and their communities. The City Council however consider that the proposed modifications for Grenoble Road (MM15), Northfield (MM16) and Bayswater Brook (MM17) would benefit from greater clarity to explain how these potential opportunities will benefit the existing local area which would help to make the policy and its supporting text sound.

7. Modifications are proposed to STRAT 11 (Land south of Grenoble Road) as part of Modification MM15. It is important to note that the reference to Blackbird Leys can mean different locations and as such should be considered as a wider area. Whilst there is a Blackbird Leys ward there is also a parish of Blackbird Leys that includes the wards of both Blackbird Leys and Northfield Brook. The areas of greatest deprivation within this locality in practice comprise LSOA areas within Blackbird Leys ward and several other wards which include areas within Northfield Brook, Littlemore and Rosehill and Iffley. It is therefore suggested that reference should be made to the Blackbird Leys Area since there is an understanding that that the reference to Blackbird Leys is referring to an area rather than a specific ward.

8. In relation specifically to paragraph 4.98 the following additional changes to those already proposed are put forward for consideration in ‘underlined’ type below:

4.98: The site is also adjacent to Blackbird Leys, one of the most deprived areas of Oxfordshire. Part of the justification for releasing this site from the Green Belt is that it can support the regeneration of this area through providing new housing stock, community facilities, employment and training opportunities and excellent sustainable transport links. The development will make a valuable contribution towards meeting Oxford City Council’s regeneration objectives for the Blackbird Leys Area through the provision of new housing alongside employment and education facilities; together with the creation of good linkages and funding

arrangements for facilities which are used by residents in both areas. This approach fully accords with the policy requirements set out in Policy STRAT11 (Grenoble Road), which seeks a 'high quality development that is fully integrated and relates closely to the existing settlement of Blackbird Leys.

9. Proposed modification MM15 relates to Policy STRAT 11 (vi). It is considered that a further amendment is required to state that: 'improvements to existing community facilities and services at Blackbird Leys necessary to address impacts arising from the increased usage by the residents of land south of Grenoble Road and development of new facilities either on the Grenoble Road site or in the Blackbird Leys Area suitable for future joint use.'

10. In relation to the Land at Northfield (Policy STRAT12), modification MM16 proposes a change to paragraph 4.103. However to make it sound the following additional text is proposed:

4.103 'An urban extension on the southern edge of Oxford will promote a sustainable form that will in part, assist the city in addressing its housing commitment of the Oxfordshire Growth Deal. Northfield is well located for access to employment and services within walking and cycling ranges and the B480 is an existing public transport corridor. There are opportunities to provide improved transport links. This site lies close to the Blackbird Leys Area, one of the most deprived areas of Oxfordshire. The development will make a valuable contribution towards meeting Oxford City Council's regeneration objectives for the Blackbird Leys Area through the provision of new housing and education facilities; and the provision of good linkages and the funding of facilities which are used by residents in both areas.'

10. The land at Northfield (Policy STRAT12) is the subject of MM16 but there are no requirements concerned with supporting regeneration at Blackbird Leys, even though this site lies within close proximity. The City Council consider that there should be a consistent policy approach with that at Grenoble Road and therefore should include the following additional text:

'a high-quality development that is fully integrated and relates closely to the existing settlement of Blackbird Leys.'

'improvements to existing community facilities and services in the Blackbird Leys Area necessary to address impacts arising from the increase usage by the residents of Northfield and development of new facilities either on Northfield or at Blackbird Leys suitable for future joint use.'

Paragraph 4.116 in respect of the Land north of Bayswater Brook identifies the adjoining area of Barton. It states 'The English Indices of Deprivation 2015 identified the adjoining area of Barton as being within the 20% most deprived areas in England. Barton is identified as a priority regeneration area in the Oxford Local Plan 2036. Development at Land north of Bayswater Brook has potential to support regeneration aspirations for Barton by increasing the viability of and contributing to the improvement of existing services and facilities and by providing new accessible services and facilities.' This supporting text would benefit from some additional text within Policy STRAT13, which would provide some consistency with other comparable policies and help to make it sound. This policy should therefore include the following:

'a high quality development that is fully integrated and relates closely to Barton (including Barton Park).

'improvements to existing community facilities and services at Barton necessary to address impacts arising from the increased usage by the residents of Land north of Bayswater Brook and development of new facilities either on the Land north of Bayswater Brook or in Barton suitable for future joint use.'