



**Statement of  
Decisions and Reasons  
in relation to representations  
on the Proposed Modifications  
to the policies in  
the Deposit Draft Structure Plan**

**September 2005**



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**OXFORDSHIRE  
COUNTY COUNCIL**

**ENVIRONMENT & ECONOMY**

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## **County Council response to representations on the Proposed Modifications to the policies in the Deposit Draft Structure Plan**

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### **Introduction**

The following tables set out the County Council's response to all comments made on the Proposed Modifications to the policies in the Deposit Draft Structure Plan, which were published for consultation during May 2005. The tables contain a summary of comments received followed by the County Council's response. Summaries are set out in the order of the chapters in the draft Plan.

Note: all policy numbers relate to the policies as proposed to be modified, not as numbered in the deposit draft Plan.

**No comments on the Proposed Modifications**

<b>REPRESENTATION</b>	<b>COUNTY COUNCIL RESPONSE</b>
2574, 809, 44, 24	Noted.

**Miscellaneous**

<b>REPRESENTATION</b>	<b>COUNTY COUNCIL RESPONSE</b>
2563 Comments relate to a specific site in the Green Belt near Wheatley which is seen as suitable for affordable housing development or commercial development giving employment to local people. Consideration should be given to this site.	Noted. However, this site specific location will be a matter for the relevant local plan/local development framework and not a matter for the Structure Plan.

**General Comments**

<b>REPRESENTATION</b>	<b>COUNTY COUNCIL RESPONSE</b>
<p>Support all proposed modifications with no comments: 3962, 1247, 1385, 619, 88, 1798,</p>	<p>Support welcomed.</p>
<p>2590 No comments to make on the proposed modifications but will press the case for an urban extension to Oxford after 2016 at appropriate opportunities, especially with SEERA.</p>	<p>Noted.</p>
<p>3969 The plan needs to have environmental sustainable development at its heart and develop a comprehensive climate change policy and strategy. Plan must enable/enforce leadership &amp; coordination at all levels, standardise actions in all councils. All developments (i.e. Oxford Town Hall/West End Development) must be environmental developments. All schools must become 'eco-schools'. Visual impact of planning applications to be secondary to environmental concerns.</p>	<p>Policies in the Structure Plan support the need to mitigate the causes and adapt to the consequences of climate change as far as possible through the planning system. A comprehensive climate change strategy would need to include matters that are not appropriate in a land use planning document. For example the Structure Plan is not able to ensure that all schools become eco-schools. If the Council were to support the need for a climate change strategy this would need to be a separate initiative, perhaps tackled in partnership through the Oxfordshire Community Partnership.</p>
<p>2568 It is regrettable that OCC has only published proposed modifications to the policies without showing deletions and additions to the explanatory text. This does not fit well with the Government desire for open transparent plan making with stakeholder engagement.</p>	<p>Noted. However, the explanatory memorandum is not part of the Plan and it has normally been the practice of this Council to publish proposed modifications to policies and prepare revisions to the explanatory memorandum at a later date.</p>

<p>2568 Welcome the County Council's acceptance of the need to provide a monitoring framework for the Structure Plan. Will be keen to work with the County Council and others such as SEERA to ensure that the framework is appropriate, robust and deliverable. Expect the County Council to forward it proposals for the framework to GOSE for comment.</p>	<p>The proposed monitoring framework to be included in the explanatory memorandum has been sent to GOSE for comment. Any changes necessary as a consequence will be taken into account in the final editing of the explanatory memorandum before publication, subject to consultation with the Cabinet members for Sustainable Development and Transport.</p>
<p>2568 It would assist plan users for the Plan to contain text to the effect that the Structure Plan should be read as a whole and in conjunction with the Regional Spatial Strategy and the relevant local plans/ development plan documents.</p>	<p>Agree. This will be included in the explanatory text in the introductory chapter.</p>
<p>2568 It would assist plan users if the Structure Plan noted that the content of saved plans will only continue to have status and be capable of being a material consideration, provided it remains relevant. It will be possible that parts of Saved Plans will be superseded by either emerging national or regional policy or by changing local circumstances.</p>	<p>Agree that this is the case, but this would also have been true under the old planning system. The transitional arrangements and guidance on saved policies is set out in PPS12. It is not considered necessary to expand the explanatory text further on this issue.</p>
<p>2738 2430 houses is too high. A requirement to have only at least 60% on previous developments is pathetically low - 95% should be the goal. Greenfield developments should be completely and totally outlawed. If the ability to build new housing did not exist resources would be used to significantly improve existing properties. Market forces would cause lowly areas to improve considerably.</p>	<p>The overall number of houses to be built in Oxfordshire was debated at the EIP who confirmed that the provision proposed is appropriate. The target for development on previously developed land is based on studies of the potential to build on land within towns and settlements in the county and is considered to be realistic. Therefore further modification is not considered to be appropriate.</p>
<p>1387 Request that more houses was needed in Thame to meet affordable housing need in the town. Most of the provision would be to the larger towns (such as Didcot), Thame would miss out.</p>	<p>The number of houses to be built within South Oxfordshire district will allow the district council to allocate some housing at Thame if it considers it appropriate, although not to the same degree as at Didcot which is an important part of the strategic development strategy.</p>

**Comments on development post 2016**

<b>REPRESENTATION</b>	<b>COUNTY COUNCIL RESPONSE</b>
<p>1540 The failure to accept recommendation 2.4 from the Panel is unsatisfactory. The reference to a "thorough appraisal of the spatial options for meeting future requirements for developments to 2016" is important and the Statement of Decisions sweeps it under the carpet. Amend plan to include text at end of Chapter 2 "referring to the interim nature of the structure plan, the emerging South East Plan and Central Oxfordshire strategy, the need for a thorough comparative appraisal of the spatial options for meeting future requirements for development to 2016, and outlining proposals for joint arrangements to ensure this is effectively taken forward through Local Development Documents". Reference should also be made to a review of the Green Belt. Alternatively text could be inserted with Policy G4.</p>	<p>The Council agreed to accept part of the Panel's recommendation by agreeing to delete the section in the explanatory text referring to the period post 2016. Revised explanatory text is included in the proposed revisions to the explanatory memorandum that reflects that circumstances have moved on since the Panel reached their recommendations at the end of 2004. Progress has been made in preparing the draft South East Plan and sub-regional strategy that largely overtakes the Panel's recommendation. It is not considered appropriate to refer to a review of the Green Belt in light of this and as SEERA has agreed that green belts should be maintained in the region. This does not prohibit local reviews by district councils should these be necessary.</p>
<p>2568 GOSE wish to be consulted on the proposed text intended to replace paragraphs 2.18-2.24 of the explanatory text regards the role of the Structure Plan in the short-term and its relationships with emerging South East Plan and Sub Regional Strategies within and/or influencing Oxfordshire.</p>	<p>The proposed revisions to the explanatory text have been sent to GOSE for comment. Any changes necessary as a consequence will be taken into account in the final editing of the explanatory memorandum before publication, subject to consultation with the Cabinet members for Sustainable Development and Transport.</p>
<p>477 Need a statement to object to the SE Plan option to develop the Begbroke/Yarnton/Kidlington triangle in the Green Belt.</p>	<p>The Structure Plan covers the period up to 2016 and it would not be appropriate to comment on possible proposals beyond 2016.</p>

**Chapter 3 General policies for development**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b><u>Policy G1</u></b></p> <p>Support with no comments:</p> <p>1768, 2618</p>	<p>Support welcomed.</p>
<p>Object with no comments:</p> <p>3967, 3968</p>	<p>Noted.</p>
<p>1250 Council has always supported the policies of restraint, but the logic of the Panel's recommendation and the County Council's proposed modification to remove the reference to restraint is accepted.</p> <p>i) the last sentence of policy should be changed to 'In rural areas limited development of an appropriate scale and type will be permitted to support the social and economic needs of local communities'; ii) the lower case text to policy G1 should include a reference to locally prepared community plans or village appraisals to help identify social and economic needs of local communities. This clarifies that 'appropriate scale and type' will generally be 'limited' to help dampen expectations for growth and be consistent with other policies in the plan including G1 b), E2 and H1.</p>	<p>Support welcomed. However, It is not considered necessary to amend policy G1 further to reflect the suggested wording as other policies in the Plan give further guidance on the scale of development in rural areas and smaller settlements. The means of identifying local needs can be included in the revised explanatory text as suggested.</p> <p>No change to policy G1.</p>
<p>1726 Sub-paragraph a) makes a clear statement that a key part of the strategy of the Structure Plan is to "deliver the level of development required". Its inclusion reinforces the Panel's view that dwelling requirements for County for the period 2001 to 2016 are to be viewed as "minimum" and not "maximum".</p>	<p>Noted.</p>

<p>1793 Object to the change of 'wellbeing' to 'needs'. Revert to original wording of G1 (a)</p>	<p>This issue was discussed at the EIP. The proposed modification allows district councils more flexibility to plan positively for appropriate development in rural areas. Other policies in the Structure Plan and local plans will provide the context for this.</p> <p>No change to policy G1.</p>
<p>1785 Retain original wording "in rural areas limited development will be permitted .... of local communities". Do not agree with the changed wording.</p>	<p>This issue was discussed at the EIP. The proposed modification allows district councils more flexibility to plan positively for appropriate development in rural areas. Other policies in the Structure Plan and local plans will provide the context for this.</p> <p>No change to policy G1.</p>
<p>1776 Support replacement of sub paragraph (a) as it makes that the Structure Plan is to "deliver the level of development required ...".</p>	<p>Support welcomed.</p>
<p>1739, 3973, 2617 Support change to para a). The EIP Panel felt that the Plan already contains policies constraining development so introducing further restraint into Policy G1 was unnecessary. Change to the final sentence is also supported.</p>	<p>Support welcomed.</p>
<p><b><u>Policy G3</u></b></p> <p>Support with no comments:</p> <p>1768, 1378, 2564</p>	<p>Support welcomed.</p>

<p>3959 Infrastructure improvements that are necessary must precede development rather than simply be co-ordinated, which does not guarantee or make commitment to have it in place to meet the needs of developments.</p>	<p>It is not always appropriate to require infrastructure in advance of development e.g. bus services before there are new residents in occupation of new housing, although this will sometimes be necessary. The proposed modification reflects this and no further change is considered necessary.</p> <p>No change to policy G3.</p>
<p>1409 Feel the sentence 'Where appropriate, phasing will be used to co-ordinate development with the provision of infrastructure' has been weakened through the insertion of the first clause.</p>	<p>The meaning of this representation is unclear. However, the modification is intended to clarify that phasing of infrastructure provision is not always appropriate and this is not considered to weaken the policy.</p> <p>No change to policy G3.</p>
<p>1793 Re-wording of the first paragraph, revert to the original wording.</p>	<p>The modification wording is intended to clarify that it will not always be appropriate for infrastructure provision to be phased, although it will in some cases. No further changes are considered to be necessary.</p> <p>No change to policy G3.</p>
<p>363 Do not delete the word 'local' because they have best knowledge to decide.</p>	<p>'Local' planning authorities are not always the decision makers in determining infrastructure and other requirements. The phrase 'planning authorities' still covers local planning authorities.</p> <p>No change to policy G3.</p>

<p>1739, 3973, 2617</p> <p>Wording is unlikely to tighten up requirement for provision of infrastructure. Could be interpreted by developers and planning authorities that infrastructure must be available or will be provided, but no requirement for its provision when its actually needed. Policy should be strengthened, delete: "in a phased manner as the development progresses". Replace with: "so that it is available at the appropriate stage of development. Where appropriate, phasing will be used to coordinate development with the provision of infrastructure".</p>	<p>The suggested wording is not considered to add any value to the policy. It is implicit in the policy that infrastructure should be provided when it is necessary.</p> <p>No change to policy G3.</p>
<p>2568</p> <p>Object to reference to "planning authorities". This is because the planning authority may not always be the decision maker in respect of planning applications, for example, in connection with appeals and call-in inquiries. In order to avoid potentially misleading users of the plan, the policy should be written in the neutral. "In determining infrastructure and other requirements, the cumulative impacts of development will be taken into account".</p>	<p>Noted, however at this stage in the plan preparation process it is considered that it would be more appropriate to make this clear in the explanatory text rather than propose a further modification to the policy.</p> <p>No change to policy G3.</p>
<p>3972</p> <p>Proposed modification re-wording is too loose and conditional. Infrastructure needs to be evaluated before development. The phrase "where appropriate" needs to be deleted.</p>	<p>The need for infrastructure to be provided to serve the needs of new development is evaluated before planning permission is granted. In some cases the provision will be made in a phased manner as the development progresses. The proposed wording of policy G3 is therefore considered to be appropriate.</p> <p>No change to policy G3.</p>

<p><b><u>Policy G4</u></b></p> <p>Support with no comments: 2618, 1371</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>Support welcomed.</p>
<p>363 Absolutely no exceptions to this policy.</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>Development in the Green Belt will only be permitted in exceptional circumstances; PPG2 addresses the issue of exceptional circumstances.</p>
<p>1807 Last paragraph should read: "Development in the Green Belt will not be permitted'. The Green Belt must be protected.</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>Development in the Green Belt will only be permitted in exceptional circumstances; PPG2 addresses the issue of exceptional circumstances.</p>
<p>76 It is essential to clarify the final wording to make a firmer commitment to the Green Belt policy. Change 'A Green Belt.....around Oxford' to 'The Green Belt as previously defined and maintained'. Add a sentence 'Housing development is to be excluded because there are no exceptional circumstances justifying the release of Green Belt land for housing before 2016'.</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>Development in the Green Belt will only be permitted in exceptional circumstances; PPG2 addresses the issue of exceptional circumstances. Further more, the proposed housing distribution does not allow for releases of land in the Green Belt for housing or other purposes. It is not considered that the proposed wording suggested to policy G4 is necessary or will add any further protection for the Green Belt than already exists.</p>

<p>2568 Important in the context of Green Belt policy to use the correct terminology. PPG2 para 3.2 uses the phrase "very special circumstances". Equally, PPG2 para 3.3 makes it clear that plans should not by accident or design suggest that particular types of development, other than those quoted in PPG2, would either be appropriate in Green Belt or exhibit the very special circumstances necessary to outweigh the harm caused by their inappropriateness. Therefore, Structure Plan paragraphs 3.11 and 3.14 should be amended accordingly.</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>Noted. Paragraphs 3.11 and 3.4 of the explanatory text can be revised to better reflect guidance in PPG2.</p>
<p>1248 Disappointed no changes to G4. Clear evidence that Green Belt south of Grenoble Rd is despoiled and could be used for the future expansion of Oxford. OCC should be even handed in considering Green Belts and consider there is a case for the creation of Green Belts around Didcot and Bicester.</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>The County Council considers that the amount of additional development that needs to be provided in the county can be located on previously developed sites, particularly in Oxford City. Therefore the release of Green Belt before 2016 is not considered necessary.</p>
<p><b><u>Policy G5</u></b></p> <p>1250 Removal of 'development away from existing settlements or outside areas allocated in the development plan will not be permitted' leaves a policy that is not sufficiently clear given that the Structure Plan is a spatial strategy guiding the location of development. The wording used should be similar to that in PPS7 – new building in the open countryside away from existing settlements, or outside areas allocated in development plans will be strictly controlled.</p>	<p>The proposed wording of policy G5 was recommended by the EIP Panel to more closely reflect the approach in PPS7. However, the intention of the policy and its meaning in light of guidance in PPS7 can be clarified in the explanatory text.</p> <p>No change to policy G5.</p>

<p>3972 Modification fosters development with a sporadic and unpredictable location and impacts on farming and forestry areas in the countryside. Amend to require recreational development on farming or forestry land to be subject to control, and restrict permitted development to zoned areas, each chosen after consideration and public consultation. Development should only be allowed where infrastructure can support increases.</p>	<p>The proposed modification reflects guidance in PPS7 and is therefore considered to be appropriate. All new development in the countryside is subject to planning control and will be considered in light of development plan policies that are subject to consultation.</p> <p>No change to policy G5.</p>
<p>1793 Removal of second sentence. Replacement of second sentence.</p>	<p>The meaning of this representation is unclear.</p>
<p>3967, 3968 Would prefer that a statement of general presumption against development in rural areas be retained.</p>	<p>The proposed modification to policy G5 continues to protect the countryside and only allows for consideration of certain types of development. No further changes are considered to be necessary.</p> <p>No change to policy G5.</p>
<p><b><u>Policy G6</u></b></p> <p>3961 Plan should adopt PPS22, which states "local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on site energy developments". All new non-residential developments above a threshold of 1,000m<sup>2</sup> will be expected to incorporate on-site renewable energy production equipment to reduce CO<sub>2</sub> emissions by at least 10%. All residential developments will be required to incorporate on-site renewable energy production equipment to reduce CO<sub>2</sub> emissions by at least 10%.</p>	<p>Agree, however it is not necessary to propose further modification to policy G6. This will be taken into account in revising the explanatory text to policy G6.</p> <p>No change to policy G6.</p>

<p>1625 Insert "technologies" after "small scale renewable energy" - for clarification and to emphasise the issue of onsite renewable energy generation raised in PPS22.</p>	<p>Noted, however it is not necessary to propose further modification to Policy G6 at this stage. This will be taken into account in revising the explanatory text.</p> <p>No change to policy G6.</p>
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**Chapter 4 Transport**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b><u>Transport general:</u></b></p> <p>477 OCC need to press harder to have more say over the A34 and to improve its capacity before building more development.</p>	<p>The EIP Panel recognise that the A34, besides its role as an International and Inter-Regional Corridor, serves as a key sub-regional distributor and vital link between major centres in the County. Policy T6 promotes the development and management of the principal transport corridors, including Oxford to Bicester and Oxford to Didcot, to support the Plan's development strategy. The County Council is continuing discussions with GOSE regarding the A34.</p>
<p>1369 Include as new policies in the Plan the policies T8, T9, T10, T11 from the adopted Structure Plan. The GTE proposals should be abandoned. New policy needed to safeguard land for additional rail capacity. Various major proposals suggested to enhance Oxfordshire's rail network.</p>	<p>The comments are similar to comments made on the consultation draft which have been taken into consideration. The Panel agreed that the Plan should not include projects for which there is no reasonable prospect of implementation within the Plan period.</p>
<p><b><u>Policy T2</u></b></p> <p>3959 Park and Ride should be supported in connection with large scale developments where the Plan restrains parking provision on site.</p> <p>2621 Specific reference should be included in the policy for improvement or extension of park and ride serving Oxford which is identified for growth.</p>	<p>New or improved park and ride may be appropriate in some cases, but other transport measures will be needed with developments to improve access to Oxford. Whilst extension of some of the existing park and ride facilities serving Oxford may be appropriate, making this a policy, as suggested, would hamper the investigation and consideration of alternative ways of improving access to Oxford which may be more suitable.</p> <p>No change to policy T2.</p>

<p><b><u>Policy T6</u></b></p> <p>Support with no comments:</p> <p>1371, 1768, 2585</p>	<p>Support welcomed.</p>
<p>3972 A policy statement should be included for a Dormitory-Hospital Transport system for collection and return of workers over the 24 hours to the Oxford hospitals terminus by special coach services from Bicester, Kidlington, Abingdon and Witney. The policy should include investigation of how rail services between Oxford, Islip and Bicester can be retained and improved.</p>	<p>The means by which the transport networks will be enhanced in a coordinated way so as to improve access to Oxford will need to be investigated in detail. Such work will be part of the preparation for the Local Transport Plans.</p> <p>No change to policy T6.</p>
<p>1250 Generally support – but should include reference in policy to employment sites at Harwell and Milton Park, as recommended by the Panel.</p> <p>1752 Should be reference in policy to employment sites at Harwell, Milton Park and Culham, as recommended by the Panel. This is justified given the emphasis on development in the south of the county in the SE Plan and reference in E1 to science and technology sectors and clusters.</p> <p>2617 Reintroduce Panel’s wording re major employment sites at Harwell, Milton Park and Culham as these are the sites considered in identifying the need for linkages on the employment/ housing axis.</p>	<p>It is considered that the inclusion of specific employment sites, whilst these are indeed important, would give a prominence to these sites which is not elsewhere in the Plan and could suggest undue priority of these over all other employment sites in the county. Reference to these sites can be included in the explanatory text, as the strategic importance of these particular sites in relation to the integrated planning of housing, employment and transportation in the south of the county is recognised. However, the emphasis given in Policy E1 to science and technology sectors and clusters applies countywide, not just in the south of the county. Employment growth will be distributed across the county, particularly to areas where jobs are needed locally.</p> <p>No change to policy T6.</p>

<p>3973, 1739</p> <p>Should specifically refer to advantages that a new settlement proposal at Shipton Quarry, focussed around a transport interchange at Shipton Quarry, would bring to Central Oxfordshire. Add bullet point on corridor between Oxford and Banbury.</p>	<p>The topics of development of a new settlement and opening of rail services from a station at Shipton Quarry were discussed at the EIP. The Panel concluded that these proposals should not be included in the Plan.</p> <p>No change to policy T6.</p>
<p>2572 Generally support – but need support text to explain how OCC expects development at Didcot to be safely accommodated. If such a statement cannot be made, the development at Didcot should be removed from the Plan.</p> <p>2564 Generally support – and trust that OCC will rigorously apply policy that ‘development that would have a significant adverse effect on the safe and efficient function of a network will not be permitted’ to the planned development at Didcot.</p>	<p>The topic was discussed at the EIP and the Panel’s recommendations have, with minor changes, been incorporated in the modified policy. The detail of how transport aspects of the development will be satisfactorily accommodated will emerge from assessment of the developer’s detailed proposals and approval by the Local Planning Authority if they are found to be satisfactory.</p> <p>No change to policy T6.</p>
<p>1733 Should be reference to Oxford Airport because of its importance to the sub-region’s economy and recognition in the Regional Transport Strategy of the scope for smaller airports to meet local demand. Oxford Airport should be added to T6 and the Key Diagram (wording suggested).</p>	<p>The Oxford Airport currently makes little contribution to the transport capacity of the County. If development of the airport were proposed, the environmental impacts and effects on the ground transport systems could be significant. Airport development in the Green Belt might be justified only if there were very special circumstances.</p> <p>No change to policy T6.</p>

<p>1248 Proposes a new inter-town route between Didcot, Abingdon and Oxford. Future development needs to be accompanied by investment in its widest sense.</p> <p>1409 Generally support – but no mention of the corridor to the M40 between Didcot and Oxford.</p> <p>1524 Generally support – but corridor between Oxford and Banbury should be added.</p> <p>1793 A34 should be included in the list of principal corridors.</p> <p>2621 The principal transport corridors should include the corridor between Oxford and M40 motorway via A40.</p>	<p>The list of principal transport corridors included in the policy and illustrated in the Key Diagram derives from the discussions at the EIP and follows the Panel recommendations.</p> <p>No change to policy T6.</p>
<p>1371 States support for Policy T6 and that transport proposals should not directly or indirectly constrain development potential, particularly at Didcot which is a location that is expected to make material contribution to housing needs in the period 2011 to 2026. Growth locations should be identified in accordance with principal transport hubs and corridors as set out in proposed amendments. This approach is likely to result in a more focused approach to the location of developments in association with transport infrastructure to create sustainable developments.</p>	<p>Support welcomed. The details of arrangements for transport proposals will be determined through the Local Transport Plan, Local Plan and Local Development Framework.</p> <p>No change to policy T6.</p>

**Chapter 5 Protecting and enhancing the environment**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b><u>Policy EN1</u></b></p> <p>Support with no comments:</p> <p>2570</p>	<p>Support welcomed.</p>
<p>3095 Insertion of "where possible" is not in line with legislation re. Areas of Outstanding Natural Beauty. Section 82(1) of the Countryside and Rights of Way acts states that AONBs are "for the purpose of conserving and enhancing the natural beauty of the area". This was reflected in the wording of Policy EN1 in the Deposit Draft, to which the former Cotswolds AONB Partnership did not object. An alternative modification of Policy EN1. The words "where possible" could be retained before "enhancement" but the words "conservation and enhancement" be inserted after "and in particular".</p>	<p>The explanatory text makes clear that the primary purpose of AONBs is to conserve and enhance the natural beauty of the landscape and that priority will be given to this in considering proposals for development.</p> <p>No change to policy EN1.</p>
<p>3963 The policy is stronger without the modification. Cancel the modification.</p>	<p>The wording of policy EN1 was discussed at the EIP and the proposed modification reflects Government advice in PPS7. Therefore further modification is not considered to be appropriate.</p> <p>No change to policy EN1.</p>
<p>3967, 3968 The weakening which the County Council's addition represents is unnecessary.</p>	<p>The wording of policy EN1 was discussed at the EIP and the proposed modification reflects Government advice in PPS7. Therefore further modification is not considered to be appropriate.</p> <p>No change to policy EN1.</p>

<p><b><u>Policy EN2</u></b></p> <p>3963 The deletion of 'Candidate', The term 'Candidate special areas of conservation' as used by English nature is distinct from 'Special areas of conservation' - both should be stated in the Policy.</p> <p>1409 First bullet point read 'Special Areas and Candidate Special Areas of Conservation'</p> <p>3967, 3968 If the point of including the word 'Candidate' was to ensure the protection of sites for which the procedure for obtaining SAC designation is in hand, then it seems reasonable to retain the word 'Candidate'</p>	<p>English Nature has recently confirmed that the European Commission has approved the list of candidate Special Areas of Conservation. The deletion of the word 'candidate' is therefore appropriate.</p> <p>No change to policy EN2.</p>
<p><b><u>Policy EN3</u></b></p> <p>Support with no comments:</p> <p>1768, 1375, 1371</p>	<p>Support welcomed.</p>
<p>1727 Support the last two sentences of the proposed modification to Policy EN3, the first sentence has removed the general presumption against development of the best and most versatile agricultural implicit in the Deposit Draft Plan. Delete first sentence of reworded Policy EN3 and replace with Deposit Draft Plan version of Policy EN3.</p>	<p>The proposed modification is in line with Government guidance in PPS7 that states that the presence of best and most versatile land should be taken into account along with other sustainability considerations. Therefore it is not considered appropriate to re-instate the wording from the deposit draft Plan.</p> <p>No change to policy EN3.</p>

<p>1793 Revert to original wording.</p>	<p>The proposed modification is in line with Government guidance in PPS7 that states that the presence of best and most versatile land should be taken into account along with other sustainability considerations. Therefore it is not considered appropriate to re-instate the wording from the deposit draft Plan.</p> <p>No change to policy EN3.</p>
<p>3967, 3968 The weakening which the County Council's wording represents is regrettable.</p>	<p>The wording of the proposed modification is intended to better reflect the most Government guidance in PPS7 that has been published since the draft Plan was prepared. The wording of policy EN3 in the deposit draft Plan is no longer appropriate.</p> <p>No change to policy EN3.</p>
<p>2572 Protecting and Enhancing the Environment: The Protection of Best and Most Versatile (BMV) Land from Hard Development. Modification is welcomed but should be updated to take into account compliance with Directive 2001/42/EC on 'The Assessment of the Effects of Certain Plans and Programmes on the Environment'. Proposed modification is extracted from PPS7 but does not consider the EC Directive or ODPM's 'A Draft Practical Guide to Strategic Environmental Assessment Directive'. The importance of the Directive in planning decisions requires recognition.</p>	<p>The preparation of all local development frameworks will be subject to the European Directive and UK Government regulations requiring strategic environmental assessment (SEA) of plans. These assessments will cover a comprehensive range of factors in addition to soil and agricultural land. Therefore it is not considered appropriate or necessary to refer to one particular aspect of SEA in this policy.</p> <p>No change to policy EN3.</p>
<p>2570 Add to second sentence "Where significant development of agricultural land is unavoidable, areas of poorer quality land shall be used wherever possible to that of a higher quality..."</p>	<p>The wording of the proposed modification that encourages use of poorer quality land in preference to higher quality unless this would be inconsistent with other sustainability considerations is in line with Government advice in PPS7. The suggested amendment is not considered to be appropriate.</p> <p>No change to policy EN3.</p>

<p>2564 The new wording follows the recommendation of the EIP Panel. However, EN3 should now reflect even more closely the wording in PPS7 as revised in Aug 2004, particularly to be explicit in the policy itself of what is meant by 'other sustainability considerations'. Change first sentence of EN3 to read: "Development on the best and most versatile agricultural land shall have regard to the classification and productiveness of such land alongside other sustainability considerations (eg. biodiversity; the quality and character of the landscape; its amenity value or heritage interest; accessibility to infrastructure, workforce and markets; maintaining viable communities; and the protection of natural resources, including soil quality)."</p>	<p>The meaning of the term 'other sustainability considerations' is better explained in the explanatory text. It is not necessary to repeat at length Government guidance in the policy.</p> <p>No change to policy EN3.</p>
<p>3963 The policy is stronger without the modification. Cancel the modification.</p>	<p>The proposed modification is in line with Government guidance in PPS7 that states that the presence of best and most versatile land should be taken into account along with other sustainability considerations. Therefore it is not considered appropriate to cancel the modification.</p> <p>No change to policy EN3.</p>

<p><b><u>Policy EN4</u></b></p> <p>2562 Ref fabric and setting Blenheim Palace and Park. Request further modification of the Structure Plan to include reference in Policy EN4 to the acceptability of the Woodstock East allocation. Inclusion of text within the Explanatory Memorandum to explain the proposed wording change to Policy EN4 will not prevent or prejudice the development of land at Woodstock East for approx. 180 dwellings. Such wording could state: "The protection of the setting of Blenheim Park does not preclude development adjoining the boundary of the designated World Heritage Site. Applications for development in locations adjoining the park should be determined having regard to the potential impact of development on the World Heritage Site. The housing element of the Woodstock East allocation (180 dwellings) identified in the West Oxfordshire Local Plan has been located so as not to cause harm to the setting of the World Heritage Site."</p>	<p>The Structure Plan is a strategic document and it is not appropriate to refer to specific sites. Therefore a reference to a specific site allocated for development is not considered appropriate. However wording based on the first two suggested sentences can be included in the revised explanatory text.</p> <p>No change to policy EN4.</p>
<p>2567 Proposed inclusion of reference to Blenheim Palace and Park World Heritage site in policy EN4 is welcomed.</p>	<p>Support welcomed.</p>
<p>2562 The inclusion of a reference to the fabric and setting of Blenheim Palace and Park within its remit and that this policy change will not affect the implementation of the Woodstock East allocation in the WODC Revised Deposit Draft Local Plan. For avoidane of doubt, request further modification to include reference in policy EN4 to the acceptability of the Woodstock allocation, or inclusion in the text to explain that the policy change will not affect the development of Woodstock East - exact wording suggested.</p>	<p>The Structure Plan is a strategic document and it is not appropriate to refer to specific sites. Therefore a reference to a specific site allocated for development is not considered appropriate. However, the explanatory text can be revised to explain how development proposals generally will be considered in relation to the World Heritage Site.</p> <p>No change to policy EN4.</p>

<p>1524 Since 1st draft, Cherwell District Council has adopted a 'local list' of buildings of historic or architectural interest. This needs to be recognised in the list of environmental receptors. Add: Locally listed buildings to 2nd sentence.</p>	<p>Local lists of buildings of local historic interest are not statutory designations and are not recognised in Government guidance in PPG15. They are a matter for the district council and are not appropriate to refer to in policy EN6.</p> <p>No change to policy EN4.</p>
<p><b><u>Policy EN6</u></b></p> <p>2567 The proposal to make Policy EN6 a discrete policy in respect of archaeology is welcomed. Delete 'and international' for avoidance of confusion in the absence of any recognised international benchmark. There is no reference to international importance in PPG16.</p>	<p>Support welcomed. The inclusion of the words 'and international' in relation to important archaeological sites is unfortunate, however it is not considered to be so significant to warrant proposing a further modification and delaying adoption of the Plan.</p> <p>No change to policy EN6.</p>
<p><b><u>Policy EN7</u></b></p> <p>3973 Inclusion of "geological sites of special scientific interest and regionally important geological sites" is excessive as it implies there might be sites not designated that are of importance. If they were at that level of importance they would either be candidate or designated sites. Deletion of the word "including" from the new proposed Policy EN7 (Policy EN6B as recommended by the Panel at recommendation 7.8) and the consequential amendment to the explanatory text as recommended by the Panel at recommendation R7.9.</p>	<p>The wording of policy EN7 allows for new discoveries of important geological features that were previously unknown but may be revealed as a consequence of development.</p> <p>No change to policy EN7.</p>
<p>1326 The inclusion of a policy specific to Geology is strongly supported and welcomed. The locally important and designated sites are Regionally Important Geological and <u>Geomorphological</u> sites (RIGS)</p>	<p>Support welcomed. The correct title of RIGS is noted and will be referred to in the explanatory text.</p>

<p>1704 Policy is inconsistent with emerging national guidelines in PPS9 on geological conservation as it applies same policy to both national and regionally important sites, rather than distinguishing between the two. Policy should be reworded: "Nationally important geological features should be protected from harmful development unless there are exceptional reasons for doing so. Development affecting national, regional and locally important geological features should aim to secure their preservation in situ or where this is not practicable, their recording or removal to another site."</p>	<p>The County Council has previously expressed the strong wish to protect nationally and regionally important geological features, and the policy as drafted does allow for the loss of features if this can be justified. The status and relative importance of the features will be a factor that is taken into account in determining the future of features affected by development.</p> <p>No change to policy EN7.</p>
<p><b><u>Policy EN9</u></b></p> <p>Support with no comments:</p> <p>2570, 1793</p>	<p>Support welcomed.</p>
<p><b><u>Policy EN10</u></b></p> <p>3964 Measures to manage demand for water. Be specific about including rainwater/grey water recycling for use in WCs as a requirement for all new housing.</p>	<p>Policy G6 encourages water conservation measures to be incorporated in all new development, which could include rainwater and grey water recycling. It is not appropriate to include this in policy EN10 which concerns the supply of water resources to new development.</p> <p>No change to policy EN10.</p>

<p><b><u>Policy EN11</u></b></p> <p>1768 Believe that water is a basic factor of life. Too many constraints against a new reservoir must be avoided.</p>	<p>It is agreed that water is a basic necessity. However policy EN11 does not prevent the construction of major new reservoirs but sets out the criteria for assessing new proposals to ensure that a major construction project is needed and other ways of better managing existing water resources have been considered.</p> <p>No change to policy EN11.</p>
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**Chapter 6 Developing the local economy**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b><u>Policy E1</u></b></p> <p>1727 Welcome that priority' is given to development in educational, scientific and technological sectors, responding to the needs of established and emerging clusters.</p>	<p>Noted. Support welcomed.</p>
<p>1752, 2641</p> <p>Support new Policy E1, particularly the statement that priority should be given inter-alia to development that supports the scientific and technological sectors and "responds to the needs of established and emerging clusters within the county".</p>	<p>Noted. Support welcomed.</p>
<p>3177 Policy significantly improves the economic policies of the Structure Plan. Our original objection to this has now been met.</p>	<p>Noted. Support welcomed.</p>
<p>1733 Consider Oxford Airport falls into the category of the 1<sup>st</sup> bullet point. Last paragraph of the Policy gives priority to development that supports existing and emerging business clusters, Oxford Airport performs this role. The inclusion of clusters in the new Policy E1 is a welcome alignment of Structure Plan policy with regional planning guidance on this issue.</p>	<p>Noted. Support welcomed.</p>
<p>1380 Want fewer restrictions on the release of land for business/employment purposes. Restraining growth of employment is desirable - we have too many jobs chasing too few people - but restricting release of land is the wrong way. It will cause further rent increases for businesses and a bonanza for landlords.</p>	<p>The strategy of the Structure Plan is to ensure that sufficient land is available in appropriate locations for employment generating development. However it is not the role of the Plan to regulate the market.</p> <p>No change to policy E1.</p>

<p>1750 No good reason for the EIP Panel's 2nd bullet point to be omitted. The point would seek to ensure new employment development is directed to areas without a high environmental sensitivity. This is appropriate given that the historic setting of Oxford underpins Green Belt rationale. The point should be included as drafted by the Panel.</p>	<p>The second bullet point of the EIP Panels recommendation is covered by Policy G1 and the environmental policies in the Plan. As the Plan should be read as a whole this bullet point is not necessary.</p> <p>No change to policy E1.</p>
<p>1739, 3973, 2617 Does not ensure that employment development is delivered in tandem with housing development in the same location to avoid unsustainable commuting. Fourth bullet point does not refer to the need to ensure that employment and housing are brought forward in tandem. Add extra bullet point to read: "be delivered in locations and at a time that is commensurate with housing development in order to ensure that the objectives of sustainability are achieved".</p>	<p>Modified policy E3 provides for the release of employment land in locations to support housing development. However the planning system has little control of the uptake of employment land that is allocated, and therefore the suggested wording is not considered to be appropriate.</p> <p>No change to policy E1.</p>
<p>1409 The word 'existing' should be deleted from 2nd bullet point.</p>	<p>This issue was discussed at the EIP. The word 'existing' is needed to clarify that the policy does not apply to proposal for new freestanding employment in unsustainable locations. It is intended to focus on development within larger urban areas and where employment generating development can contribute to reducing the need to travel and where walking, cycling and use of public transport can be encouraged.</p> <p>No change to policy E1.</p>
<p><b><u>Policy E2</u></b></p> <p>Support with no comments:</p> <p>2618, 1371</p>	<p>Support welcomed</p>

<p>1250 Oxford City has a significant surplus of jobs relative to resident workforce. Proposed policy is unlikely to achieve balance between jobs and residential workforce. Policy should redress current imbalance, not maintain it. Final sentence of policy is less encouraging towards re-use of employment sites. The wording of draft policy E1 should be retained.</p>	<p>This issue was discussed at the EIP. The County Council considered that the Panel's recommendation would give a clearer reflection of what the County Council is seeking to achieve in Oxford in maintaining a diverse and vibrant economy whilst addressing the imbalance between jobs and workforce.</p> <p>No change to policy E2.</p>
<p>3959 Fails to recognise explicitly the special needs of NHS healthcare development. Specific reference to development for healthcare NHS purposes where development sites are necessarily restricted by need for proximity to existing NHS facilities and/or the community being served.</p>	<p>Reference to the needs of a particular employment sector is too specific to be included in a Structure Plan which is intended to provide strategic guidance.</p> <p>No change to policy E2.</p>
<p>1625 Insert "in" after "set out" in the first paragraph.</p>	<p>Noted. This was a typographical error in publishing the Proposed Modifications to the policy. The word 'in' is to be included in policy E2 between the words 'set out' and 'Policy E1'. This will be amended when the Plan is adopted.</p>
<p>3967, 3968 I prefer the WODC wording, as being less likely to encourage excessive development.</p>	<p>The meaning of this representation is unclear.</p>
<p>3970 "...the balance between jobs and resident workforce in the city..." What does this mean? Please find a clearer form of words.</p>	<p>This is explained in the explanatory text to Policy E2.</p> <p>No change to policy E2.</p>

<p>1739, 3973, 2617</p> <p>Does not fully reflect the amendment to para 42 of PPG3 introduced in Jan 05. That policy requires local authorities to review their employment sites with a view to delivering housing on sites that are no longer required for employment purposes, provided a series of criteria can be met. Reword policy and text to reflect PPG3.</p>	<p>This issue was discussed at the EIP. Policy E2 allows for housing development to be considered on former employment sites and whether sites should be retained in employment use.</p> <p>No change to policy E2.</p>
<p><b><u>Policy E3</u></b></p> <p>1750 There is no attempt to identify existing clusters in the new policy, except Grove. Area around Oxford Airport/Kidlington is thriving and would benefit from being excluded from the Green Belt. Area to the north west of Kidlington is as worthy of identification as Carterton, Faringdon and Wallingford, which have no strategic potential. On the issue of Green Belt releases, a steer from the Structure Plan is needed to help meet Oxford's employment land needs. Include a policy encouraging Local Planning Authorities to include cluster strategies within their Local Development Frameworks.</p>	<p>These were issues discussed at the EIP. New Policy E1 seeks to support and respond to the needs of existing and emerging clusters within the county. However, the EIP Panel concluded there is not an overriding need for strategic releases of land in the Green Belt for employment in the Plan.</p> <p>No change to policy E3.</p>
<p>1739, 3973, 2617</p> <p>Whilst the objective of the new text following the word "Grove" is broadly acceptable, it would be better if the text were tied to the need to ensure that employment development is provided at the same time and in the same location as large scale housing development. Add sentence: "where large scale housing development is due to take place then commensurate employment development should also be considered in the same location, having regard to the need to ensure that sustainability objectives are achieved, and in particular having regard to the existing and likely travel to work patterns of the residents of the new housing development".</p>	<p>The wording inserted in policy E3 relates specifically to meeting local employment needs in smaller towns, recognising that health checks and local action plans can identify local needs that should be met. In this context the suggested wording is not appropriate.</p> <p>No change to policy E3.</p>

**Chapter 7 Housing**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b><u>Policy H1</u></b></p> <p>Support with no comments:</p> <p>1378, 1251</p>	<p>Support welcomed.</p>
<p>73 similar representations from the following respondents (residents of Marsh/Toot Baldon) supporting the deletion of development South of Grenoble Road.</p> <p>1064, 1062, 3972, 3973, 1088, 3974, 2667, 3975, 3976, 612, 3977, 3978, 2762, 4010, 887, 855, 2673, 3979, 1228, 1073, 265, 3980, 870, 3981, 3982, 3983, 3984, 3985, 2679, 3986, 3987, 893, 4011, 3988, 863, 903, 3989, 857, 3990, 3991, 3992, 3993, 3994, 3995, 3996, 891, 654, 1092, 3997, 1030, 3998, 3997, 1059, 4000, 503, 4001, 930, 4002, 4003, 2681, 4004, 4005, 1209, 942, 1025, 1058, 4006, 4007, 4008, 4009, 2687, 2688, 841.</p>	<p>Support welcomed</p>
<p>1727 Deletion of 1,000 dwellings at Grenoble Road Urban Extension is welcomed, but object to corresponding increase in Oxford City due to constraints i.e. flood plains, historic buildings etc. Doubt whether enough developed sites will be available. Total 8,500 dwellings allocation should remain as sites are available in South Oxon i.e. Ladygrove North, Didcot. In Policy H1 revert to the Deposit Draft Plan housing provision for Oxford and South Oxfordshire, but delete reference to the Grenoble Road Extension.</p>	<p>The amount of housing proposed to be built within Oxford can be accommodated on previously developed land within the City, and the figure was determined taking into account a study of urban housing potential by the City Council. The figure was debated at the EIP who concluded that the proposed provision of 6,500 was appropriate.</p> <p>No change to policy H1.</p>

<p>1409 Welcomed the deletion of the mixed use development on land south of Grenoble Road, Oxford, which would have set a precedent for development on green belt land.</p>	<p>Support welcomed.</p>
<p>3967, 3968 The South East is already out of proportion with the rest of the UK in levels of economic activity and population density. Do not favour encouraging further imbalance by excessive house-building, and therefore prefer the original WODC figure of 36,500.</p>	<p>The total number of houses to be built in Oxfordshire was debated at the EIP and the Panel concluded that the figure of 37,300 dwellings is appropriate.</p> <p>No change to policy H1.</p>
<p>3966 More housing for Cherwell. More rentable (affordable) housing is required - not only for families - but the ever increasing single population - who haven't an income to support paying private landlords, i.e. studio flats or 1 bed properties.</p>	<p>Noted. The provision of affordable housing including rented housing is a high priority of the local authorities in Oxfordshire. Policy H4 in the draft Plan encourages the provision of affordable housing as a proportion of planning applications for housing.</p>
<p>1785 The last paragraph of H1 now deletes "at least 55% of new development should be built on previously developed land.....". This wording should be retained - not deleted - particularly the 55% figure.</p>	<p>The EIP Panel considered that the best approach is for the Structure Plan to require local planning authorities to maximise the amount of development that is built on previously developed land, rather than apply a county wide target that in reality will vary from district to district in terms of what is achievable. The Council has decided to retain the target for monitoring purposes but deleting the target from the policy does not in effect reduce the priority be given to maximising development on previously developed land.</p> <p>No change to policy H1.</p>

<p>468 The modification incorporates allocation of new dwellings, numbers some 1000, to the general "Oxford" group, whereas previous wording clearly shows the proposed number of dwellings for "land south of Grenoble Road". The new text does not make clear the sites of these dwellings. Reinstatement in some form of the clear proposal to build on land south of Grenoble Road, which is no longer mentioned in H1, so individuals are not misled into assuming that this area of green belt is now safe from development.</p>	<p>The proposed deletion of the urban extension to Oxford on land south of Grenoble Road was debated at the EIP and the Panel agreed with the County Council that there are no exceptional circumstances to justify releasing land from the Green Belt for housing up to 2016. The number of houses proposed for Oxford can be accommodated on previously developed sites within the City.</p> <p>No change to policy H1.</p>
<p>1397 New wording seeks to keep the Green Belt safe around Oxford for the foreseeable future.</p>	<p>Noted.</p>
<p>1415 Endorse the proposed increase in the housing allocation for Oxford - there is justification for increasing the housing allocation to Oxford City still further. There is scope and justification for further new housing in Oxford by developing Safeguarded Land, which extends to 72 hectares. Having been allocated previously its development in the Structure Plan would be appropriate.</p>	<p>The number of houses to be built in Oxford assumes that development can be accommodated on previously developed land without use of safeguarded land, which is safeguarded for long term development needs. The decision about when it is necessary to bring forward safeguarded land for development is a matter for Oxford City Council.</p> <p>No change to policy H1.</p>
<p>1371 Object to the housing distribution strategy for Oxford City and South Oxfordshire. Doubt the ability of all 6500 dwellings to come forward on previously developed sites and consider that a contingency plan to allow additional development within South Oxfordshire should monitor identify insufficient dwellings coming forward on previously developed sites within Oxford. Strategy should identify a general growth location to the north east of Didcot, north of A4130. However, the opportunity to re-consider the position through emerging South East Plan is welcomed, including an appraisal of the country town approach and hierarchy of settlements in accommodating additional growth as urban extensions.</p>	<p>The proposed distribution of houses was debated at the EIP and endorsed by the Panel. They considered that the 6,500 dwellings proposed to be built in Oxford is likely to be realised. It would not be appropriate for the Plan to refer to a contingency plan should these dwellings not come forward as this would not provide clear strategic guidance. Development at Didcot up to 2016 assumes that development already planned mainly to the west of the town in the adopted Structure Plan to 2011 will be built out up to 2016. It would not therefore be appropriate to refer to an alternative or additional direction of growth up to 2016.</p> <p>No change to policy H1.</p>

<p>2443 Satisfaction of proposed modification of H1. If there are any future changes to policy H1, we would like to be advised so we can advise Horspath residents.</p>	<p>Noted. Support welcomed. All respondents who have commented on the Plan at the various stages of public consultation will be kept informed of the progress of the Plan.</p>
<p>1546 Welcome no change proposed on the EIP inspectors report and recognition that housing targets can be met without incursions into the Oxford Green Belt.</p>	<p>Support welcomed.</p>
<p>1768 Modify the final sentence of the 2nd paragraph as follows: "In small settlements and villages housing development will be allowed where local village economic needs and sustainability are proven in order to avoid stagnation of village communities".</p>	<p>The wording of the second paragraph of policy H1 is already intended to allow development to meet local needs. The word 'limited' indicates that development in small settlements and villages will only be allowed for this purpose. The suggested wording is not considered to be necessary.</p> <p>No change to policy H1.</p>
<p>2618 Doubt the ability of all 6500 dwellings to come forward on previously developed sites within Oxford City. Overall dwelling requirement to 2016 and beyond 2026 can be reviewed in accordance with emerging South East Plan. Support identification of Didcot as a location for additional growth as it represents a strategic location. Welcome the opportunity to re-consider position through emerging South East plan, inc. appraisal of the county town approach and hierarchy of settlements in accommodating additional growth.</p>	<p>The proposed distribution of houses was debated at the EIP and endorsed by the Panel. They considered that the 6,500 dwellings proposed to be built in Oxford is likely to be realised.</p> <p>No change to policy H1.</p>

<p>1738, 1737, 1735</p> <p>Refers to Grove as a main location for housing in its own right. This conflicts with the key diagram, which identifies Wantage/Grove as a single principal location for housing and town centre development. On H1 and any other policy where Grove is identified separately, amend to read "Wantage/Grove".</p>	<p>The key diagram refers to Wantage/Grove because policies H1, E2, TC1 refer to either Grove, Wantage or both settlements. Therefore it is not necessary to refer to Wantage/Grove in policy H1 in order to match the key diagram as there is no conflict between them.</p> <p>No change to policy H1.</p>
<p>1250</p> <p>Support the proposed modification to remove the reference to an extension of Oxford into the Green Belt south of Grenoble Road. Reference to housing development in small settlements being limited to that required to meet local needs and support balanced communities in villages should be clarified in the lower case text as it is vague and imprecise. What local needs are to be met? What is a balanced community in a village and what criteria will be used to assess it?</p>	<p>The wording of policy H1 as proposed to be modified reflects the views of the EIP Panel that the policy should more fully reflect Government guidance in PPS7 that some limited development of an appropriate scale can support the needs of local communities and businesses. This can be explained in the explanatory text.</p> <p>No change to policy H1.</p>
<p>1762</p> <p>Support deletion of "an urban extension for mixed use development on land south of Grenoble Road, Oxford" and retention of provision of 2,100 dwellings at Grove. Persimmon controls 98% of former airfield west of Grove and supports allocation for mixed use development in Vale of White Horse Local Plan.</p>	<p>Support welcomed.</p>
<p>1413</p> <p>Support particularly the decision to delete the proposed "urban extension for mixed use development on land south of Grenoble Road, Oxford". As it made clear at the Examination in Public, Oxford Preservation Trust is opposed to the arbitrary release of Green Belt land around Oxford for housing.</p>	<p>Support welcomed.</p>

<p>394 Support the deletion of land south of Grenoble Road. It is an unnecessary intrusion into the Oxford Green Belt.</p>	<p>Support welcomed.</p>
<p>1323 Welcome withdrawal of proposal to build houses on Green Belt south of Grenoble Road and support resultant reduction of 1000 houses in the target for South Oxfordshire. Support the proposed increase in housing development in Oxford City on previously developed sites within the City.</p>	<p>Support welcomed.</p>
<p>952 Support the CC housing strategy and distribution and the continuing recognition that housing targets for the plan period can be achieved without the need to encroach on the green belt in South Oxfordshire.</p>	<p>Support welcomed.</p>
<p>3959 Infrastructure, particularly public transport to enable workers to access employment opportunities in healthcare (NHS) in Oxford Housing developments in Oxford and the five towns mentioned must be accompanied by improved public transport including park and ride to enable those living there to access healthcare and employment opportunities in the NHS.</p>	<p>Noted. Identification and provision of the infrastructure needed to serve new development is an important issue. It is recognised in policy G3 and the transport policies.</p>
<p>1726 Overall requirement for dwellings in Cherwell and new dwellings in Banbury should be "absolute minimum". Panel believes the Structure Plan figures will be revised upwards in 2006, due to South East Plan. Housing delivery in Cherwell is failing to meet required level, so land including greenfield, will be required to the north of Banbury. An acknowledgement that the figures are minimum were included in the supporting text of the policy so that the word "about" cannot be interpreted as justifying "less".</p>	<p>The numbers of houses in policy H1 are not intended to be precise and they are therefore described as 'about'. In the context of removing the phrase 'by restraining the overall level of development' from policy G1 it is not considered necessary in addition to refer to the number of houses to be built as a minimum.</p> <p>No change to policy H1.</p>

<p>2634 Endorse the acceptance of the proposed pre EIP change to delete the provision for 1000 dwellings on land south of Grenoble Road.</p>	<p>Support welcomed.</p>
<p>1533 Agree with the removal of land south of Grenoble Road from the list of locations for new housing.</p>	<p>Support welcomed.</p>
<p>1524 The deletion of "conversion of existing buildings". Such conversions usually represent the most sustainable approach, even where this leads to lower densities. Policies such as that set out, are often used to justify unacceptable damage - a listed building is a 'pre-used site". Add: "Proposals will only be acceptable where they are compatible with other policies in this plan, particularly with regard to the historic and natural environment and public open space. The conversion and reuse of existing buildings is the most sustainable approach, even where this results in reduced densities.</p>	<p>The Plan should be read as a whole and development proposals must be considered against all relevant policies, including those to protect the environment. This is a key part of the general strategy of the Plan in policy G1a) which says that the development required should be delivered while protecting and enhancing the environment, character and natural resources of the county. Given these safeguards the suggested amendment is not considered to be necessary.</p> <p>No change to policy H1.</p>
<p>2572 Deletion of proposed urban extension south of Grenoble Road providing growth close to the City/ Oxford Science Park with potential for excellent public transport. Distributing housing provision elsewhere will increase private transport, resulting in greater emission of greenhouse gasses. A full SEA should be undertaken. Housing allocations for the four rural districts to be modified with reinstatement of 1000 dwellings to south of Grenoble Road, an increase in SODC by 1000 dwellings, reductions in other districts and allocation in Oxford unaffected. SEA implemented and published. Policy for location of developments should be shown to be consistent with its findings.</p>	<p>The deletion of the urban extension to Oxford on land south of Grenoble Road was debated at the EIP and the panel agreed with the County Council that there are no exceptional circumstances to justify releasing land in the Green Belt for development up to 2016. An SEA of the Plan is not required under the SEA Regulations. However, a sustainability appraisal of the Plan was carried out as it was being prepared and this was published as a background paper when the draft plan was placed on deposit.</p> <p>No change to policy H1.</p>

<p>2570 Change back to deposit draft policy, i.e. housing allocation of 36,500, not 37,300, and Bicester's housing allocation no more than 3,200 due to the very tight consent levels on Bicester STW by the Environment Agency. Growth beyond the 2430 residential units per year could present difficulties in respect to wastewater, as additional infrastructure capacity will be required. Development will need to be phased to allow sufficient time for Thames Water to provide the required infrastructure capacity.</p>	<p>The overall number of houses to be built in Oxfordshire and the provision at Bicester were issues debated at the EIP and the Panel endorsed the distribution proposed by the County Council in the pre-EIP changes of 37,300 dwellings for the county and about 3,300 at Bicester. The need to ensure that waste water infrastructure is provided is recognised in policy EN10 as proposed to be modified.</p> <p>No change to policy H1.</p>
<p>2564 Object to deletion of proposal for 1000 dwellings south of Grenoble Road. Distributing houses elsewhere around the County, and not in the Oxford catchment, will cause people to use their own transport, increase congestion and greenhouse gases. Green Belt policy should be re-visited - much of the justification of the Green Belt in Policy G4 could apply equally well to land around other towns. The housing allocations for the four rural districts should be modified to reflect the reinstatement of up to 1000 dwellings to the south of Grenoble Road, with a commensurate increase in SODC, reduction in other districts, and with the allocation within Oxford being unaffected.</p>	<p>The deletion of the urban extension to Oxford on land south of Grenoble Road was debated at the EIP and the Panel agreed with the County Council that there are no exceptional circumstances to justify releasing land in the Green Belt for development up to 2016. The Panel also found no compelling case for re-distributing housing to bring the urban extension to Oxford back into consideration.</p> <p>No change to policy H1.</p>
<p>1785 Allocation of 400 additional homes in the Vale of White Horse is unfair in this overwhelmingly rural area. Cuts in housing in Oxford and S. Oxon are contrary to plan which states commuting to urban centres and building in areas not well served by public transport should be avoided. Vale of White Horse housing should not increase above original 6,750 figure. Reinstate last paragraph of H1 "At least 55% of all new development should be built on previously developed land".</p>	<p>The distribution of housing was debated at the EIP and the Panel endorsed the distribution proposed by the County Council. The Panel found no compelling case for re-distributing housing to bring the urban extension to Oxford on land in South Oxfordshire back into consideration. The target for the amount of housing to be built on previously developed land is to be retained in the explanatory text for monitoring purposes. However, the County Council accepted the Panel's recommendation to delete it from policy H1 due to the difficulties in applying a standard rate to all districts.</p> <p>No change to policy H1.</p>

<p>1739, 3973</p> <p>37,300 housing provision from 2001 to 2016 is insufficient. The EIP Panel noted that expansion would continue and housing numbers would need to be revised upwards. We have previously made a strong case for a new settlement at Shipton Quarry. Revise housing figures to reflect actual situation. Acknowledge figures as "absolute minimum". Identify Shipton Quarry as a location for a new settlement in the period 2001-2016 and with longer term merits post 2016. Emphasis of interim nature of plan in explanatory text.</p>	<p>The overall number of houses to be built in Oxfordshire was debated at the EIP. The Panel saw no benefit in increasing the overall number of houses and endorsed the figure and distribution proposed by the County Council in the pre-EIP changes. The distribution is based on estimates of housing potential within urban areas and urban extensions to existing settlements in accordance with the search sequence in PPG3. Therefore it is not necessary to identify an alternative development option. In the context of removing the phrase 'by restraining the overall level of development' from policy G1 it is not considered necessary in addition to refer to the number of houses to be built as a minimum. The revisions proposed to the explanatory text acknowledge the interim nature of the Plan.</p> <p>No change to policy H1.</p>
<p>2617 Provision of housing at a level of 37,300 from 2001 to 2016 is considered insufficient. Should be increased to between 43,000 and 47,500 to reflect factors including the Sustainable Communities Plan, Barker review, backlog of housing delivery, increased international migration etc.</p>	<p>The overall number of houses to be built in Oxfordshire was debated at the EIP. The Panel saw no benefit in increasing the overall number of houses and endorsed the figure and distribution proposed by the County Council in the pre-EIP changes.</p> <p>No change to policy H1.</p>
<p>1807 We do not agree with your proposal to further increase the numbers of additional dwellings between 01 April 2001 - 31 March 2016. The south-east is already vastly overcrowded.</p>	<p>This overall number of houses to be built was debated at the EIP and was endorsed by the EIP Panel.</p> <p>No change to policy H1.</p>

<p>2568 Text eventually included in structure plan should not inadvertently give the impression that 55% minimum expectation for previously developed land is of itself and acceptable target percentage. Instead the text should make it clear that where higher percentages can be achieved in accordance with national, regional and local policy, on both a general and site specific basis, they should be.</p>	<p>Agree. The text already refers to the target as a minimum and can be revised further to reflect this comment.</p>
<p>1369 Subject to environmental considerations, the proposed Shipton-on-Cherwell development could be environmentally sustainable if the proposed rail station could be provided.</p>	<p>The development strategy proposed in the Plan has been prepared in accordance with Government advice in PPG3 that locations for housing development should be sought first within urban areas and then urban extensions to existing towns, and then finally new development around nodes in good quality public transport corridors. Even if it is possible for a station and rail services to be provided at Shipton Quarry, the amount of development to be provided in Oxfordshire can be accommodated within and adjoining towns in accordance with the search sequence in PPG3. Alternative strategic development locations are not necessary up to 2016. This view was endorsed by the EIP Panel.</p> <p>No change to policy H1.</p>
<p><b><u>Policy H2</u></b></p> <p>1378 Support with no comments:</p>	<p>Support welcomed.</p>
<p>1369 Where ever new housing is placed on the former airfield site, the new settlement would create a significant overall increase in private car journeys. The Upper Heyford development is environmentally unsustainable and it should be deleted from the Plan.</p>	<p>A limited amount of new development is proposed at the former Upper Heyford airbase as an exception to planning policies for sustainable development in order to achieve the objectives set out in Policy H2. The Council recognises that it is not a sustainable location for development and for this reason the number of dwellings to be built is limited.</p> <p>No change to policy H2.</p>

<p>3959 Lack of recognition of need for local healthcare provision and access to secondary healthcare. Infrastructure must be provided for healthcare (NHS) and to enable those living in Upper Heyford to access secondary healthcare (NHS) and employment opportunities within the NHS.</p>	<p>The infrastructure listed in policy H2a) is not an exclusive list. Appropriate healthcare provision to serve the needs of the development proposed at Upper Heyford may be sought under policy G3.</p> <p>No change to policy H2.</p>
<p>2577 Proposed change to the Panel's version of H2 is unlawful due to errors and omissions in the committee reports and absence of adequate and intelligible reasons. Proposed change will allow District Council, through planning and conservation, to support improvements inappropriate to the conservation of Cold War heritage. Panel's recommendation should be accepted.</p>	<p>Legal Services have examined the arguments put forward by this objector and are satisfied that the decision is not unlawful. The County Council and the Cherwell District Council have accepted the importance of conserving the Cold War heritage at Upper Heyford. However, it must be realised that heritage interest is not the only factor to be considered in deciding how the former air base should be developed, which must be balanced by the considering the needs of future residents and providing them with a satisfactory place in which to live. In considering the EIP Panel's recommendation the County Council considered that finding the right balance between these factors to be of prime importance. The EIP Panel acknowledged "that there are objectives to be achieved apart from securing and managing the site's heritage value, namely achieving environmental stability and upholding sustainable development principles." To enable appropriate decisions to be reached in revising the comprehensive development brief for the site a conservation plan is currently being prepared in full consultation with English Heritage. This is reflected in the revised explanatory text.</p> <p>See also response to 2567 which raised similar issues.</p> <p>No change to policy H2.</p>

<p>2567 Concerned over potential adverse impact upon heritage value of former Cold War airbase Upper Heyford, seen as reducing the weight to be given to protection of heritage interest of the site. H2 appears to reverse the priority in favour of environmental improvements. Additional qualification is proposed to be introduced by requiring conservation of the airbase to be 'compatible with a satisfactory living environment', whatever that might mean. Detailed evaluation of the conservation importance of the Cold War airbase is underway in advance of a revised planning brief and such modifications might lend support to those interests that would prefer to see removal of a substantial part of the heritage interest of the site. Subject to the outcome of the conservation plan, it is the identified heritage interests that should be regarded as the 'given' and design of the new 'enabling' development should fit that landscape, rather than the other way around. Policy EN1 should be rephrased 'where appropriate' rather than 'where possible' given that the latter may not necessarily result in overall benefit. Object to ref "landscape restoration" as opposed to "landscape works and management". This harks back to the approach of the Cherwell Local Plan rather than any sensitivity with regards to the conservation plan approach.</p>	<p>In considering the EIP Panel's recommendation, the County Council considered that it is appropriate for the conservation of the Cold War heritage to be one of the factors to be taken into account in preparing development proposals for the site. However, the Council also considered that finding the right balance between achieving environmental improvements, conserving heritage interest and providing a satisfactory living environment for future residents to be of prime importance. Therefore, the wording of policy H2 as proposed to be modified is intended to reflect that an appropriate balance needs to be found between the relevant factors. Circumstances have moved on in that Cherwell District Council are not progressing their draft Local Plan and are currently preparing a conservation plan in consultation with English Heritage. This will inform the revised comprehensive planning brief and enable appropriate decisions to be reached about how to conserve Cold war heritage while accommodating new development that provides a satisfactory living environment for those living there, including deciding what environmental improvements are appropriate. This is reflected in the revised explanatory text. The introduction of the phrase "compatible with a satisfactory living environment" is intended to ensure that the living environment of what is after all to be a place where people have to want to live is also factored into the balance. The phrase "landscape restoration" has been substituted for the phrase "landscape works and management, restoration" as a simpler form of wording. The term "landscape restoration" would include works and management.</p> <p>No change to policy H2.</p>
<p>1793 Object to the removal of 'including existing dwellings' and general change of emphasis in the policy, particularly the importance given to the conservation of the site as a military base with Cold War Associations. Replacement of 'including existing dwellings' - revert to original proposed policy.</p>	<p>The wording of policy H2 was debated at the EIP. The Panel recommended amendments to the policy to give flexibility to retain or not the existing dwellings and reflect the increased emphasis being given to conserving Cold War heritage. The County Council has partially accepted the Panel's recommendations, and it is not considered to be appropriate to revert to the original wording in light of the Panel's conclusions.</p> <p>No change to policy H2.</p>

<p>3967, 3968</p> <p>It seems unaccountably retrogressive for the CC to propose removing the passage about walking, etc. rather than car use. I oppose the modification.</p>	<p>Policy H2c) that refers to encouraging walking, cycling and use of public transport is not proposed to be modified and is to be retained as worded in the deposit draft Plan. Therefore no modifications are necessary.</p> <p>No change to policy H2.</p>
<p><b><u>Policy H3</u></b></p> <p>3961 Need to be more prescriptive about what is required when stating that housing developments should be designed to a high quality. Suggest the following wording; "Developments of over 100 units are expected to achieve a BREEAM Ecohomes rating of "excellent" across the site; 10 to 99 units to achieve "very good" rating across the site; 1 to 9 units achieve "good" rating for each unit."</p>	<p>In principle encouraging new housing development to be built to high eco-homes ratings is supported. However, to include this in a policy at this stage in plan preparation would result in delaying adoption which is undesirable for the reasons set out in the report to Cabinet of 6 September 2005. Therefore it is considered that achieving at least eco-homes standard 'very good' should be referred to in the explanatory text as an element of achieving high quality design.</p> <p>No change to policy H3.</p>
<p>3959 Design for "lifetime" is not mentioned. Houses should be designed as "lifetime' dwellings to ensure that older and disabled people can continue to live at home with no or minimal modification for as long as practicable.</p>	<p>Encouragement is given to building a proportion of houses in new developments as 'homes for life' in the explanatory text. It is considered to be too detailed to refer to this in the policy.</p> <p>No change to policy H3.</p>
<p>363 No change to H3 (a).</p>	<p>The revised wording does not change the intent of the policy.</p> <p>No change to policy H3.</p>

<p>1793 Revert to original wording.</p>	<p>The revised wording does not change the intent of the policy.</p> <p>No change to policy H3.</p>
<p><b><u>Policy H4</u></b></p> <p>Support with no comments:</p> <p>1378</p>	<p>Support welcomed.</p>
<p>1739, 2617, 3973</p> <p>Deletion of 50% target welcomed but reduction to lower case text not supported and should be removed entirely. Including even an aspirational figure will indicate that such a figure will be expected when it has not been justified properly. Support the amendment to Policy H4 but object to the changes to the explanatory text at paragraph 7.16 and recommend that the 50% target be deleted from the explanatory text.</p>	<p>Increasing the provision of affordable housing remains a high priority of the County Council. The EIP Panel recommended that the target should be included in the explanatory text against which to monitor provision. The Panel also did not consider 50% to be an unreasonable figure to set. Although challenging. The County Council has accepted the Panel's recommendation to include the target in the explanatory text as a monitoring indicator and there is not considered to be any justification for changing this view.</p> <p>No change to policy H3.</p>
<p>1371, 2618</p> <p>Support the deletion of 50% requirement in Policy H4 and the requirement for an affordable housing requirement commensurate with local needs, to be identified through a local housing needs study. However, as a caveat, the level of affordable housing provision on a given site must be considered against the costs of providing new infrastructure. An onerous affordable housing requirement could constrain sites from coming forward for development.</p>	<p>Noted. The funding of infrastructure and affordable housing from development is a matter for negotiation on an individual site basis and is ultimately a matter for the local planning authority taking into account relevant factors.</p>

<p>2568 GOSE welcomes the County Council's continuing efforts to address housing needs for affordable housing. However the text eventually included in the structure plan will need to emphasise the following in the pursuit of affordable housing. Should not result in the overall housing requirement for the County and the individual districts not being delivered; must be based upon up-to-date, robust Housing Needs Assessments and a clear, realistic understanding of the likely funding available; must be via negotiation taking account of government guidance on the use of planning obligations and any other material considerations, it cannot be an absolute requirement; must emphasise that the aspiration is for up to 50% of all housing in the County to be affordable. Thus it is not a target for all sites, but instead will allow district and/or site circumstances to be taken into account as part of the negotiations, and hence potentially result in developments that include more or less affordable housing than the 50% aspiration; should be implemented in a manner that is sufficiently flexible to allow for changing circumstances.</p>	<p>The issues identified by GOSE that should be referred to in the explanatory text are all matters that local planning authorities are required to undertake or take into consideration under Government guidance. The proposed revisions to the explanatory text make it clear that the 50% target is a monitoring target rather than a requirement for all sites. Therefore it is not considered to be appropriate or necessary to include explanatory text to the level of detail suggested.</p>
<p>2631 Support the proposed change to Policy H4 that places the emphasis in the policy on the need for affordable housing levels to be determined at the local level and as a result of up-to-date assessments of need.</p>	<p>Support welcomed.</p>

**Chapter 8 Town centres**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b><u>Policy TC2</u></b></p> <p>1807 The words '... or the environment' - should be added to the last sentence.</p>	<p>The policies in the Structure Plan should be read as a whole. This will be covered by other policies in the Plan which seek to protect the County's environment, particularly G1 and G2.</p> <p>No change to policy TC2.</p>
<p>1524 Policy must acknowledge the importance of also preserving or enhancing the character or appearance of town centres and cannot be allowed to take priority over other plan policies. Add: 'Proposals will only be acceptable when they are compatible with other policies in this plan, particularly with regard to the historic environment and public open space'.</p>	<p>Noted. However, the policies in the Structure Plan should be read as a whole. This will be covered by other policies in the Plan which seek to protect the County's environment, particularly G1 and G2.</p> <p>No change to policy TC2.</p>
<p>3967, 3968 See no need for the weakening represented by the modified wording.</p>	<p>The proposed modification to TC2 seeks to strengthen the policy by requiring development proposals in centres to demonstrate a need for new development. This requirement was previously only in the explanatory text to the policy but has been added to the policy to strengthen it further.</p> <p>No change to policy TC2.</p>

**Chapter 9 Recreation and leisure**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b><u>Policy R2</u></b></p> <p>363 Add "unless acceptable alternative ways are provided" to the policy.</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>The County Council did not see any merit in amending the policy in light of previous comments received during consultation. Again, there would be little advantage in amending the policy at this stage to reflect the suggested wording.</p>
<p><b><u>Policy R3</u></b></p> <p>3967, 3968 I disagree with this modification as it would encourage further development.</p>	<p>The proposed modification to policy R3 still requires proposals for new permanent moorings to be assessed against the criteria in policy R3 and through the development control process at the local level.</p> <p>No change to policy R3.</p>
<p>1369 The River Thames links many major freight locations and several canals; its tonnage capacity below Oxford is substantial. It should be County Council policy to assess the current level of freight traffic on the Thames, identify what significant additional traffic the river could attract, and identify low cost measures that could encourage any such traffic.</p>	<p>Noted, however this is too detailed for the Structure Plan. The issue of freight transport on waterways is covered by Policy T4 in the Plan.</p> <p>No change to policy R3.</p>

<p><b><u>Policy R4</u></b></p> <p>Support policy making no comments:</p> <p>1793, 3967, 3968, 1524</p>	<p>Support welcomed.</p>
<p>1250 Council continues to support the proposed new policy which protects the route of the Wilts and Berks Canal.</p>	<p>Support welcomed.</p>
<p>1323 Support enhancement of protection of waterways in Oxon and the Oxford Canal within the Oxford City due to their valuable environmental and recreation amenity.</p>	<p>Support welcomed.</p>
<p>2568 The meaning of the policy is unclear, ambiguous, vague and imprecise. Where will plan users find out what areas are affected? When will appropriate routes be decided and by whom? What criteria will be used to assess impacts on canal corridors and does it rely on neighbouring authorities? Policy and text should be re-examined.</p>	<p>Noted. This will be taken into account in revising the explanatory text. However, it is not considered necessary to amend the policy at this stage. The Vale of White Horse Local Plan/Local Development Framework will include exact details of the existing route of the Wilts and Berks Canal and any proposed new routes, and explain how development proposals affecting the canal will be assessed.</p> <p>No change to policy R4.</p>
<p>1369 The policy is welcomed but it needs to be robust, its challenges may include the Abingdon reservoir proposal and development pressure at Wantage/Grove. It should be County policy to safeguard the historic site of the Oxford Canal basin; reinstatement of the basin could strengthen the West End development.</p>	<p>Noted. Exact details of development affecting the existing route or any new route of the Wilts and Berks Canal will be a matter for the Vale of White Horse Local Plan/Local Development Framework. The second sentence is too detailed for the Structure Plan.</p> <p>No change to policy R4.</p>

**Chapter 10 Energy**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b><u>Policy EG1</u></b></p> <p>1625 Insert "such as tackling climate change" after "and their wider environmental" and before "and economic benefits" to make the connection with greenhouse gas emissions and climate change more explicit.</p>	<p>This can be included in the explanatory text as it is adding explanation to the wording of the policy.</p> <p>No change to policy EG1.</p>
<p>2568 Policies meaning is unclear, ambiguous, vague or imprecise. In particular the use of phrases/terms such as "will generally be supported" or "be encouraged" may not provide sufficient information and do not provide certainty for landowners, developers or the public about how the local planning authority will determine planning applications on specific sites. PPG12 (Annex A Paragraph A23) - the Council should re-examine the policy in order to ensure that it states clearly in what circumstances planning permission will or will not be granted.</p>	<p>The wording of the policy as proposed to be modified as in line with Government guidance in PPS22 that requires policies to promote and encourage renewable energy. The policy makes it clear that there is a positive stance towards proposals for renewable energy development generally, and sets out the criteria that will be taken into account in determining whether particular proposals should be permitted, also in line with PPS22. Further modification is not considered to be necessary.</p> <p>No change to policy EG1.</p>
<p>3965 Replacing "will generally be supported" with "will be encouraged", and making reference to the wider environmental and economic benefits of development, clearly reflects the key principles of national planning policy (PPS22: Renewable Energy).</p>	<p>Support welcomed</p>

<p>3967, 3968</p> <p>Support renewable energy being "encouraged". Oppose the addition of "and economic" in the proposed addition to the second sentence. The environmental aspects are of overwhelming importance.</p>	<p>The inclusion of 'and economic' is to reflect that the benefits of all proposals whether large or small, including economic benefits, are material considerations that should be given significant weight in determining applications for planning permission. This is in line with Government guidance in PPS22</p> <p>No change to policy EG1.</p>
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**Chapter 11 Minerals**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b>Chapter 11</b></p> <p>1369 The first item in the list of constraint factors in the County's area Assessment Methodology for minerals extraction should be amended to 'accessibility to the main road network and also to either rail freight or a suitable waterway'. The County's current preferences for future mineral extraction should then be modified according to this revised constraint.</p> <p>Note: This comment relates to the Sand and Gravel Background Information Report, October 2003.</p>	<p>The Structure Plan does not now identify locations for mineral working. This will be done in the Minerals and Waste Development Framework. Policy M2 sets out factors that will be taken into account in assessing alternative locations. This includes "accessibility to the main transport routes", which encompasses rail and water routes as well as the main road network.</p>
<p><b><u>Policy M1</u></b></p> <p>99 Support making no comments.</p>	<p>Support welcomed.</p>
<p>700 Will bring major improvement in these policies and deserve support.</p>	<p>Support welcomed.</p>

<p>1369 An additional sentence should be added to the final paragraph of the policy to read. 'Mineral working will not be permitted except where satisfactory facilities are provided to transport minerals away by means other than road, such as rail or a suitable waterway'.</p>	<p>Most mineral extraction in Oxfordshire is to supply local markets, in particular for construction materials. Whilst there may be opportunities to use rail or water to transport minerals at some locations, it is expected that for most mineral working sites the most appropriate, and often the only practical, mode of transport will be by road. The suggested addition to Policy M1 would therefore be unreasonable. Policy M2 sets out factors to be taken into account in assessing alternative locations for mineral working and these include "accessibility to the main transport routes", which encompasses rail and water routes as well as the main road network. Paragraph 11.20 (previously 11.19) cross-refers to Policy T4, under which the use of non-road modes of transport for minerals will be encouraged. This paragraph has been amended to clarify this and to refer specifically to waterways as well as rail. There is no need for transport to be covered in Policy M1 as well.</p> <p>No change to policy M1.</p>
<p>1625 No objection is raised to the wording change to Policy M1.</p>	<p>Noted.</p>
<p>2568 It may assist plan users to include text regarding the fact that mineral working may also not necessarily conflict with the objectives and purposes of AONB's.</p>	<p>It is not necessary to repeat Government policy on AONBs. Development within AONBs is covered by Policy EN1; appropriate scale development is not precluded in AONBs provided the natural beauty of the landscape is not harmed. It is more appropriate to consider detailed application of policy on AONBs to proposals for mineral working in the Minerals and Waste Development Framework.</p>
<p><b><u>Policy M2</u></b></p> <p>99 Support making no comments.</p>	<p>Support welcomed.</p>

394	Support new wording of Policy M2. The proposed modification is a fairer way of assessing areas of proposed extraction.	Noted. Support welcomed.
700	Will bring major improvement in these policies and deserve support.	Support welcomed.
1248	Support the rewording of Policy M2. It is important the location of sand and gravel workings are integrated into the infrastructure needed for the provision of development within the SE Regional Plan.	Noted. Support welcomed.
1369	The County Council prefers the Stadhampton-Berinsfield-Warborough-Benson area to the Wallingford-Cholsey-South Moreton area. But if minimising the environmental impact of mineral transport were added to the constraints then this preference should be reversed. The Wallingford-Cholsey-South Moreton area seems to offer considerably better scope for mineral transport by rail, river or both.	The Structure Plan does not now identify locations for mineral working. This will be done in the Minerals and Waste Development Framework, and all options for new mineral working locations will be re-considered. The objectives of the Structure Plan include: to reduce pollution and emissions of greenhouse gases; and to locate development where it can reduce the need to travel. The Minerals and Waste Development Framework will have due regard to these objectives. Policy M2 sets out factors that will be taken into account in assessing alternative locations. This includes “accessibility to the main transport routes”, which encompasses rail and water routes as well as the main road network.
1369	Mineral working areas at Eynsham-Cassington-Yarnton and the Lower Windrush Valley could benefit from reinstatement of the Witney-Oxford rail line.	The Structure Plan does not now identify locations for mineral working. This will be done in the Minerals and Waste Development Framework. Potential locations for mineral working in the Eynsham-Cassington-Yarnton and Lower Windrush Valley areas will be assessed along with all other locational options, taking into account the factors in Policy M2. This will include consideration of access to sites and transport of minerals, having due regard to Policy T4, which encourages the use of non-road modes of transport.

1375 Support move away from identifying strategic resource areas in structure plan.	Support welcomed.
1533 Agree with the removal of the Stadhampton / Berinsfield / Warborough / Benson area as a specific area for the location of sand and gravel working.	Support welcomed.
1550 Matters taken into account when identifying locations for sand and gravel extraction in the Minerals & Waste Development Framework. Expand wording to include specifically and unequivocally the consideration of cumulative impact of digging across an area. This impact is not contained adequately in current statement.	<p>The specific issue of cumulative impact is covered by the general factors set out in Policy M2, in particular the safeguarding of land uses which are sensitive to nuisance. The text following Policy M2 (paragraph 11.10) is proposed to be amended to make it clear that the cumulative impact of mineral working across an area will be taken into account in applying the factors in Policy M2 to the identification of locations for mineral working, including in the consideration of planning applications.</p> <p>No change to policy M2.</p>
1625 An objection is raised to the proposed re-writing of Policy M2. Gloucestershire MPA recognise the emerging Minerals & Waste Development Framework as delivering the future locations of strategic resource sites for sand and gravel, reference should be made to the existing adopted Oxford Minerals and Waste Local Plan as it provides the planning framework for minerals and waste in Oxfordshire.	The adopted Minerals and Waste Local Plan is referred to in paragraph 11.2. This paragraph has been amended to clarify that the Minerals and Waste Local Plan is currently 'saved' (continues in force) until September 2007.
2567 The recasting of policy M2 is welcomed, particularly the reference to the need to safeguard important archaeological remains, historic buildings and areas.	Support welcomed.

<p>2634 Supporting the proposed removal of the strategic resource areas for sharp sand and gravel working and the Stadhampton-Berinsfield-Warborough-Benson area in particular.</p>	<p>Support welcomed.</p>
<p>2878 Support amended policy M2. It endorses the conclusions of the Panel as to the approach to be used for the selection of areas of minerals extraction and looks forward to the introduction of the fairer, more transparent and more evidenced approach which should result.</p>	<p>Noted. Support welcomed.</p>
<p>3970 "...development plan policies ..."Should it not refer to "Local Plan / Local Development Framework" ?</p>	<p>"Development plan policies" is the appropriate term because it encompasses the Structure Plan and Regional Spatial Strategy as well as Local Plans / Local Development Frameworks.</p>
<p>3971 Concerned at apparent acquiescence to insatiable demands for minerals' extraction. Extensions of existing workings will be detrimental to the visual and environmental amenities of villages and hamlets that are neighbours. The policies allow too much scope for extraction applicants to circumvent policies on minerals' extraction. Minerals extraction is an environmental and amenity deficit upon villages and hamlets. Extraction businesses should contribute financially to those same villages and hamlets to compensate. The cost of minerals extraction is too cheap where lost amenity is the subsidy. There should be a minerals' extraction royalty based on the weight of minerals extracted, to be paid as compensation to the local communities as lost amenity compensation. A compensation-based amenity policy will ensure that businesses concentrate extraction sites where compensation costs are least in value. Thus amenity losses will be reduced.</p>	<p>Policies M1 and M2 will enable necessary supplies of minerals, particularly sand and gravel, to be provided so that Oxfordshire can make an appropriate contribution to meeting society's needs while at the same time ensuring that unacceptable environmental, transport and other impacts are avoided and that important environmental features and areas and other interests of importance, including villages and hamlets, are protected. Policy M2 provides an overall and clear policy context for the identification of locations for mineral working in the Minerals and Waste Development Framework, by setting out the factors to be taken into account in assessing alternative locations. Pending preparation of the Minerals and Waste Development Framework, these factors will also be material considerations in the determination of planning applications for sand and gravel working. The text following Policies M1 and M2 (paragraphs 11.7 – 11.11) has been amended to clarify this. Issues to do with the costs of mineral working, royalties and financial compensation are not legitimate planning considerations and it would therefore not be appropriate to include them in the Structure Plan.</p> <p>No change to policy M2.</p>

<p><b><u>Policy M3</u></b></p> <p>3971 Object making no comments</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>Noted.</p>
<p><b><u>Policy M4</u></b></p> <p>3971 Object making no comments</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>Noted.</p>

**Chapter 12 Waste management**

REPRESENTATION	COUNTY COUNCIL RESPONSE
<p><b><u>Policy WM3</u></b></p> <p>1625 If it cannot be satisfactorily demonstrated that Oxfordshire has enough landfill void space for biodegradable waste to 2016, then Gloucestershire Waste Planning Authority would wish to object to policy WM3. An element of landfill is likely to be needed as part of any sustainable waste management system to dispose of residues potentially transported to adjacent counties, i.e. Gloucestershire. This may not be the best practical environmental option re. the proximity principle and regional self-sufficiency. WM3 should address this.</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>Policy WM3 does not preclude landfill but seeks to ensure it takes place only where beneficial. It is currently assessed that Oxfordshire's landfill needs can generally be met by the infilling of mineral workings within the county, and this is supported by the emerging Regional Waste Management Strategy. This policy must be read in conjunction with Policies WM1 and WM2 which seek generally to ensure that sufficient facilities are provided within Oxfordshire to manage the waste produced in the county. Paragraph 12.14 says the provision required will be established in the Minerals and Waste Development Framework and the need for additional landfill capacity will be kept under review. However, disposal or residues from waste treatment processes may require specialist facilities that are not available locally, in which case transport of these wastes to facilities in other counties that are able to accept them may be appropriate.</p>
<p>2568 We are uncertain as to why the County Council would wish to oppose all screening bunds, landscaping features golf courses and country parks purely on the basis that they may involve importation of material. Therefore the reasoning behind the text should be clarified.</p>	<p>This policy was not proposed to be modified by the County Council.</p> <p>Paragraph 12.17 has been amended to clarify that where this type of development involves the deposit of waste above original ground levels, under Policy WM3 it is likely to be opposed by the County Council unless there would be an overall environmental benefit.</p>