

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
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Appendix 1; Oxford Local Plan 2001-2016 – Representations on Proposed Modifications

MOD 3	1.2.3 Role & Purpose of the Plan	Oxfordshire County Council / 449	Support , objection overcome	Noted	No change to Plan
MOD 4	1.2.4 Role & Purpose of the Plan	Oxfordshire County Council/ 449	Support , objection overcome	Noted	No change to Plan
MOD 11	1.6.3 Sustainability Appraisal	Oxfordshire Architectural & Historical Society / 556	Objection , 'Sustainability Appraisal' should be more clearly defined - the plan has presumably been subject to Sustainability Appraisal and Strategic Environment Assessment. Monitoring and reporting on the implementation of the plan should be carried out against the reports emanating from the SA/SEA procedures, which should have informed the formulation of policy. The role of SA and SEA should be clarified and defined by reference to ODPM guidance on these procedures.	Not Agreed The Local Plan was written before the SEA Directive came into force in July 2004 or the Planning & Compulsory Purchase Act 2004. The City Council has now commenced work on its Local Development Framework under the new legislation and the accompanying Sustainable Appraisal, which will include monitoring in accordance with the ODPM guidance. No amendment to the Local Plan is therefore considered necessary.	No change to Plan
MOD 21	2.5.2 Planning Obligations	Oxfordshire County Council / 449	Support , accept Inspector's view	Noted	No change to Plan
MOD 22	2.5.4A Planning Obligations	Oxfordshire County Council / 449	Support , objection met in that reference is included but the modification should clarify that the Guidance note has been agreed by all the Council's in Oxfordshire, not just the County Council.	Noted The Guidance note was not formally agreed by the City Council, so it would not be appropriate to insert the additional clarification requested.	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 31	CP.7A Efficient Use of Land & Density	Oxfordshire Architectural & Historical Society / 556	Objection , object to the deletion of the wording 'setting'. This should remain as a general principle for the setting of the City and areas within it.	Not Agreed The revised wording was recommended by the Inspector to improve clarity. The Inspector evidently did not consider the words 'it's setting' to be necessary in the context of this policy. Reference to the compatibility of development proposals with the 'surrounding area' remains within the policy.	No change to Plan
MOD 43	CP.19A Natural Resource Impact Analysis	Oxfordshire Architectural & Historical Society / 556	Support , the NRIA as a Supplementary Planning Document should include the need to take account of the advantages of maximising maintenance of old or historic buildings as a means of maximising the encapsulated energy already expended in their materials and construction as compared with the energy and materials costs of demolition; materials manufacture, procurement and transport; and construction of new build developments.	Noted	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 50	2.21.2 Air Quality Management Areas	Oxfordshire Architectural & Historical Society / 556	Objection , air quality is a very important issue in relation to the potential chemical damage to stonework, which makes up the fabric of a very high proportion of the historic buildings in the core area of the City covered by the streets cited. The amendment is poorly worded since the proposal to keep the area 'under review' allows it to be diminished as well as enlarged. It should not be diminished within the foreseeable period of the Plan. The amendment should be reworded: 'The possible need to extend this area will need to be kept under review.'	Not Agreed Paragraph 2.21.2 makes clear that the AQMA is based on areas where the annual mean nitrogen dioxide objective is unlikely to be met. As it is possible that air quality may improve in parts of the AQMA, for example due to implementation of the Air Quality Action Plan, it is also possible that some areas within the AQMA may, when subject to review, no longer merit inclusion. The wording proposed by MOD 50 accords with the Inspector's Recommendation 2.30/2 and is entirely appropriate.	No change to Plan
MOD 53	2.22.1 Telecoms	Mobile Operators Association / 560	Support , changes in line with the Inspector's recommendations	Noted	No change to Plan
MOD 54	2.22.2 Telecoms	Oxfordshire Architectural & Historical Society / 556	Objection , this modification has lost some of the intent of the original wording about the impact of telecoms masts. The need to minimise 'environmental impact' is not limited to visual intrusion, as the rewording would imply. We also object to the deletion of 'landscapes of key significance' – this instead should be replaced by 'important landscape and townscape character'.	Not Agreed The revised wording for this paragraph was proposed by the Inspector's Recommendation 2.31/4. Reference is made to other potential environmental concerns, namely health and noise issues, in paragraph 2.22.5. The Inspector did not consider that 'Landscapes of Key Significance' were necessary as most of the land covered by this designation was also Green Belt or covered by Nature Conservation designations. With regard to the objector's suggestion of designating areas of 'important townscape character', this role is already performed by Conservation Areas.	No change to Plan

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MOD 54	2.22.2 Telecoms	Mobile Operators Association / 560	Support , the extra clarity in the paragraph is welcomed.	Noted	No change to Plan
MOD 55	2.22.5 Telecoms	Mobile Operators Association / 560	Objection , PPG8 is clear that it is not for the planning system to determine health safeguards as other bodies and legislation take care of this. Explicit reference to these matters in a planning document will serve only to raise expectations that these matters are within the remit of the planning system. Appeal decisions and Court cases have consistently shown that whilst in principle public concerns about health can be material considerations the weight to be afforded these must be limited due to the consensus scientific opinion which has found that living or working close to mobile phone base stations has not been associated with adverse health effects.	Not Agreed PPG8 states in paragraph 29 that health considerations and public concern can in principle be material considerations when considering applications for planning permission or prior approval. This modification was made as a pre-inquiry change, which was accepted by the Inspector in his Recommendation 1.1/1.	No change to Plan
MOD 56	2.22.6 Telecoms	Mobile Operators Association / 560	Support , conditionally, provided the Council's HRIA requirements do not go further than what is required from PPG8 and the Code of Best Practice.	Noted The Mobile Operators Association will be a consultee when the SPD on HRIA is prepared.	No change to Plan
MOD 57	CP.24 Telecoms	Mobile Operators Association / 560	Support , in line with the Inspector's recommendation.	Noted	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 62	3.4.2 Travel Plans	Oxfordshire County Council / 449	Support , objection overcome	Noted	No change to Plan
MOD 66	3.6.4 Car Parking Standards	Oxfordshire County Council / 449	Support , objection overcome	Noted	No change to Plan
MOD 68	3.7.4 Pedestrians and Cyclists	Oxfordshire County Council / 449	Support	Noted	No change to Plan
MOD 81	4.3.1 Safeguarded Land	Worcester College / Kier Property / 111	Support , the Proposed Modification to paragraph 4.3.1 clarifies the role and purpose of Safeguarded Land. It is fully supported.	Noted	No change to Plan
MOD 82	NE.3 Safeguarded Land	Worcester College / Kier Property / 111	Support , the Proposed Modification to Policy NE.3 helps to clarify the intended role and purpose of Safeguarded Land. It is supported.	Noted	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 92	4.6.17 Water & Sewerage Infrastructure	J.A. Pye / 390	<p>Objection, as the Inspector recommended deletion of Policy NE.14 as a whole, there is no basis on which the supporting text can be retained either in full or in part. It is not clear on what basis the retention of the rest of the paragraph would ensure that 'proper consideration' is given to planning applications. The relevance of the capacity issues associated with sewerage infrastructure for existing residents is a matter which the LPA should progress with the appropriate undertaker and not private landowners or developers in determining planning applications.</p>	<p>Not Agreed Annex B, paragraph BA of Planning Policy Statement 12 on Local Development Frameworks' states that 'When it comes to an individual planning application, the adequacy of infrastructure can be a material consideration in deciding whether permission should be granted'. It defines infrastructure as including 'water supply and sewers'. Given this advice and the fact that there have been problems with inadequate sewage disposal including deposition in people's gardens during flooding in parts of Oxford, it is considered appropriate to have a policy on water and sewerage infrastructure in the Oxford Local Plan. While it is true that the Local Plan Inspector did consider this policy to be 'entirely superfluous' it was also his view 'that there would be no actual harm in retaining this policy' in the form given in the Proposed Modifications. The City Council has been progressing improvements to sewerage infrastructure with the appropriate undertaker, but there may be cases where new developments would accentuate existing unresolved problems and for this reason it is considered that this policy should be retained.</p>	No change to Plan
MOD 93	NE.14 Water & Sewerage Infrastructure	J.A. Pye / 390	<p>Objection, delete whole of policy. The Inspector has found that the "policy is entirely superfluous". The relevance of the capacity issues associated with sewerage infrastructure for existing residents is a matter which the LPA should progress with the appropriate undertaker and not private landowners or developers in determining planning applications.</p>	<p>Not Agreed As response to MOD 92, objector 390</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 93	NE.14 Water & Sewerage Infrastructure	Thames Water Plc / 203	Objection , it is not easy to plan for and appraise windfall sites, and providing the necessary upgrades for windfall sites does not always fit well with the 5-year rolling funding programme. It is for this reason we may request funding from developers or a relevant planning condition. Suggest a further change to Policy NE.14(b) to additionally state: "A planning condition and a developer contribution, via a planning obligation, may be required to bring forward the necessary extra capacity before development commences".	Not Agreed Footnote 2 to Circular 05/2005 on 'Planning Obligations' states: "The use of S106 of the 1990 Act in order to secure the provision of infrastructure for water supply, sewerage or sewage disposal should not be necessary because it will already be the developers responsibility to requisition the provision of a water supply by the water company under section 41 of the Water Industry Act 1991 and/or the provision of sewers under section 98, and the provision of associated infrastructure by the water company is financed by infrastructure charges levied by companies under section 146 of the 1991 Act for any new connection". The change proposed is therefore not necessary. See also response to MOD's 92/93 objector 390. The City Council has sought a balanced policy approach, which recognises the need to ensure adequate provision of water and sewerage infrastructure without imposing unreasonable demands on developers.	No change to Plan
MOD 94	NE.15 Loss of Trees and Hedgerows	Oxfordshire Architectural & Historical Society / 556	Objection , the Hedgerow regulations include historic as well as natural criteria for their retention and this should be reflected by the addition of 'historic' as well as ecological interest.	Not Agreed The Hedgerow Regulations 1997 were made under the Environment Act 1995, rather than the Town & Country Planning Act 1990. It is not therefore appropriate to make reference to matters covered in the Hedgerow Regulations in the Local Plan.	No change to Plan
MOD 96	NE.17 Biodiversity	Oxfordshire County Council / 449	Support	Noted	No change to Plan

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MOD 105	5.2.2 Archaeology	Oxfordshire Architectural & Historical Society / 556	Objection , we are concerned that while the listed building policies allow for the archaeological recording of alterations to historic buildings, this does not cover other above ground structures or historic landscape features. Suggested text provided.	Not Agreed The objector suggests changes to 5.2.2, which is supporting text to Policy HE.2. However, the objection relates to the fact that Policy HE.5 ensures that evidence from archaeological remains in listed buildings is recorded, but that this does not extend to other historic structures or features. HE.2 requires an archaeological assessment to check for remains where it is not certain that they exist, and ensures that where they do exist they are preserved or recorded if an application would lead to the breaking up of the ground. Referring to above ground structures in the context of this section of the Plan is not appropriate. Policy HE.5 refers to archaeological remains within listed buildings because listed buildings are likely to contain important evidence about their past and about building techniques, which is one reason why these buildings are listed. They are a special case and have a specific policy. Other policies already exist to protect historic structures and landscapes, for example HE.10, HE.1 and HE.3.	No change to Plan
MOD 106	HE.2 Archaeology	Oxfordshire Architectural & Historical Society / 556	Objection , we believe that the principle of archaeological recording should include other aspects of the historic environment, not just below ground deposits. Published results should clearly be both for the benefit of the public as well as future research. Suggested text supplied, including grammatical alterations.	Not Agreed See comments above. That the results of the archaeological assessments are to be published will naturally be of benefit for the public and for the advancement of archaeological study. There is no need to point this out in the policy. The suggested grammatical changes constitute quite a major change to the text which is inappropriate at this stage and which is unnecessary for the clarity of the Plan, as the current wording is clear and not misleading (the objector does not actually suggest that the current wording is unclear).	No change to Plan

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MOD 107	Section 5.3 Listed Buildings	Oxfordshire Architectural & Historical Society / 556	<p>Objection, strongly welcome inclusion of this explanatory text to clarify and strengthen policy relating to the setting of listed buildings. However, the concept of setting and hence these principles, apply equally to nationally important archaeological monuments whether scheduled or not and historic parks and gardens. This becomes especially important where the settings of all these categories overlap and contribute to each other. Such overlap is unusually common in Oxford. Suggest this paragraph be moved to section 5.1 of the Plan and reworded. Suggested text supplied.</p>	<p>Not Agreed</p> <p>The supporting text on the setting of listed buildings was moved from the deleted section 5.7, based on the recommendation in paragraph 5.16.1 of the Inspector's report. This says that: 'With the exception of listed buildings, Policy HE.11 appears to simply duplicate the provisions of Policies HE.10, HE.8 and HE.1....' He concludes that HE.11 and Section 5.7 should be deleted and a separate policy on the setting of listed buildings be added to section 5.3.</p> <p>The setting of ancient monuments is already covered by HE.1 and the setting of historic parks and gardens in HE.10. To include a general paragraph on setting in section 5.1 would be contrary to the Inspector's recommendation. It is agreed that there is an overlap of different types of setting, but having them mentioned in separate policies does not mean that they will not all be considered. The Plan should always be read as a whole.</p>	No change to Plan

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MOD 108	HE3/HE4 Listed Buildings	GOSE / 395	<p>Objection, the proposed combined HE3/HE4 policy should be rewritten to more closely reflect PPG15 Planning and the Historic Environment. The second sentence of the new policy needs to be qualified in line with PPG15, which does not place a complete moratorium on the demolition of listed buildings. The final paragraph of the new policy is unclear and should be rewritten, it is not apparent from the text that its aim is to prevent harm to the setting of a listed building.</p>	<p>Not Agreed</p> <p>MOD 108 relates to PIC28, which was made because three objectors including English Heritage suggested HE.3 was too weak. It was decided to strengthen the policy by removing mention of the exception that may allow demolition of listed buildings. As stated in paragraph 3.17 of PPG15: 'There are many outstanding buildings for which it is in practice almost inconceivable that consent for demolition would ever be granted. The demolition of any Grade I or Grade II* building should be wholly exceptional and should require the strongest justification.' Paragraph 3.19 of PPG15 outlines the considerations that a decision to demolish a listed building should be based on. These are long and complex and it would be inappropriate to include them in the Plan. As demolition is accepted as something that should happen as an exception, it is appropriate not to mention it in the Plan. If it was to be allowed it would be as an exception to the Plan and the considerations in PPG15 could then be referred to. PIC28 was fully endorsed by the Inspector, who says in paragraph 5.7.6 of his report: "To my mind, the architectural and historic heritage of Oxford is a strong justification for the Council to express this policy as a presumption against demolition. With respect to the guidance and the special character of Oxford, the protection offered through the policy should not be diluted by a reference to an exception. In any event, it would be open for an applicant to demonstrate overriding material considerations in appropriate cases. In conclusion I support PIC 28 and do not consider it to be onerous."</p> <p>The final paragraph of the new policy is considered to be clear and understandable.</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 109	5.4.1 Buildings of Local Interest	Oxfordshire Architectural & Historical Society / 556	Objection , since the purpose of the policy is to help protect buildings that contribute to people's sense of place and the historic character of their locality, this would be clearer if it explicitly referred to seeking public input to the compilation of the list - as half implied in the explanatory text. This could be achieved by adding 'having sought input from local residents and amenity groups' to the end of the modification.	Not Agreed It is not necessary for the Plan to describe in detail how the list is compiled, as this would make the Plan less succinct and is unnecessary. A brief summary of the criteria to be used in identifying buildings of local interest is shown, and this includes buildings that are valued by the local community.	No change to Plan
MOD 110	HE.7 Buildings of Local Interest	Oxfordshire Architectural & Historical Society / 556	Support , we strongly welcome the clarification and strengthening of this policy.	Noted	No change to Plan
MOD 111	5.5.1 Conservation Areas	Oxfordshire Architectural & Historical Society / 556	Objection , we are concerned that while the cross-reference to Core Policy does refer to the special attention needing to be given to Conservation Areas, this would be helped by more explicit reference to appraisals of the character of Conservation Areas. Suggested additional text.	Not Agreed Cross-reference is made to CP.9 as this contains policy that should be taken into account. The existing appraisals of the Conservation Areas describe their character and were used to help make designations, but they do not contain planning policy. The Plan does not refer to all background documents, particularly where they do not contain policy, and it would not be appropriate to do so here. Work is now being undertaken to produce Conservation Area appraisals, which will be done in consultation with local residents and amenity groups. They will be produced and adopted under the new planning system and may form part of the Local Development Framework, so it is not necessary to refer to them in the Local Plan.	No change to Plan
MOD 111	5.5.1 Conservation Areas	Oxfordshire County Council / 449	Support , objection overcome	Noted	No change to Plan

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MOD 112	5.5.3 Conservation Areas	Oxfordshire Architectural & Historical Society / 556	Objection , it would be helpful if Appendix 4A indicated which currently listed Conservation Areas have Conservation Area Appraisal Statements. This will be important in relation to the review mechanism referred to in this text.	Not Agreed The Oxford Local Plan is designed to remain as up to date as possible, so lists should not include information that will soon change. Some of the existing appraisals of the Conservation Areas are out of date, and none of them contain planning policy, so they are not referred to.	No change to Plan
MOD 113	HE.8 Conservation Areas	Oxfordshire Architectural & Historical Society / 556	Support , welcome the modifications to clarify and strengthen the policy to preserve and enhance Conservation Areas. As a matter of grammar the policy should refer to conservation areas in the plural throughout, not just in the last sentence.	Noted The comment about grammar is accepted. Amend Policy HE.8 to change all references to 'Conservation Area' in the singular to 'Conservation Areas' in the Plural	
MOD 114	5.6.1 Important Parks & Gardens	Oxfordshire Architectural & Historical Society / 556	Support , welcome this modification.	Noted	No change to Plan
MOD 115	HE.10 Important Parks & Gardens	Oxfordshire Architectural & Historical Society / 556	Support , welcome this modification	Noted	No change to Plan
MOD 116	HE.11 Setting	Oxfordshire Architectural & Historical Society / 556	Support , note the deletion of the separate policy on setting, and the inclusion of setting in each of the groups of policies. We believe that this is broadly the right approach, but suggest that this strongly reinforces the case for altering the explanatory text to cover all the policies relating to setting, as suggested in our comment on Modification 107.	Noted	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 117	5.8.7A View Cones of Oxford	Oxfordshire Architectural & Historical Society / 556	Objection , we are concerned that the wording of this policy still implies that the overall policy (to 'retain significant views') is limited by the wording to certain fixed-point view cones. This is a restricted concept that does not reflect how people appreciate views unfolding - whether towards or out from the City as they move through the City or its surroundings. Suggest inserting the word 'particularly' before 'seeks to protect ten views across Oxford'.	Not Agreed This is a policy established to protect the most significant views in Oxford. Only ten views are picked out in order to make this a workable policy. Paragraph 5.8.7B of the Plan describes these as the outstanding views of Oxford. The policy is designed to afford these special protection. It would be unfeasible to protect all views, but that is not to say that other views are not taken into account. For example, Policy HE.12 (High Building Areas) is designed to protect views more generally, with specific focus on retaining the dominance of the existing spires and domes that make up the Oxford skyline.	No change to Plan
MOD 118	HE.13 View Cones of Oxford	Oxfordshire Architectural & Historical Society / 556	Objection , we are concerned that the wording of this policy still implies that the overall policy (to 'retain significant views') is limited by the wording to certain fixed-point view cones. This is a restricted concept that does not reflect how people appreciate views unfolding - whether towards or out from the City as they move through the City or its surroundings. Suggest inserting the word 'especially' at the beginning of the parenthesis '(the view cones)'.	Not Agreed As response to MOD 117, objector 556	No change to Plan
MOD 120	6.3.1 Structure Plan and Regional Planning Guidance Numbers	Oxfordshire Architectural & Historical Society / 556	Objection , we believe that the reference should be to the 'Draft' Oxfordshire Structure Plan 2016.	Not Agreed Whilst the objector is technically correct, the emerging Structure Plan is also at the post-Modifications stage and is likely to be adopted around the same time as the Oxford Local Plan. Accordingly, it would make the Local Plan unnecessarily out-of-date to now refer to the 'Draft' Structure Plan at this late stage.	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 165	HS.17 Institutional Student Accom.	Oxford Brookes University / 336	Objection , object to proposed modification to Policy HS.17, as it is too restrictive. There may be sites that could be redeveloped to a greater density thus releasing a part of an existing site for an alternative use. Suggest inserting at end of the sentence 'unless alternative provision is made on the site or elsewhere'.	Not Agreed As large numbers of students already live outside purpose built accommodation and student numbers are forecasted to grow there is a continuing and pressing need for further student accommodation. Therefore if existing student accommodation can be developed to a greater density, any vacated space on this site should be developed for further student accommodation. For this reason the Local Plan Inspector stated in paragraph 7.23.15 of his report in relation to this policy: 'I endorse the protection that would be afforded to existing and future purpose built student accommodation. It would be inappropriate of the Plan to refer to any exceptions, even for other worthy land uses.'	No change to Plan
MOD 176	8.2.3 Sustainable Employment	Oxfordshire County Council / 449	Support , accept Inspector's view	Noted	No change to Plan
MOD 177	8.3.2 Protection of Key Employment Sites	Oxfordshire County Council / 449	Support , accept Inspector's view	Noted	No change to Plan
MOD 178	EC.2 Protection of Employment Sites	Oxfordshire County Council / 449	Support , accept Inspector's view	Noted	No change to Plan
MOD 179	8.3.3 Protection of Employment Sites	Oxfordshire County Council / 449	Support , accept Inspector's view	Noted	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 179	8.3.3 Protection of Employment Sites	The Nuffield Orthopaedic Centre NHS Trust / 554	<p>Objection, circumstances have altered since the Local Plan Inquiry. This site has not been declared surplus to NHS requirements and is being retained for use by the Trust. Part of the site has the benefit of planning permission for the erection of a health centre and research facilities falling within Use Class C2. The intention is that the site (excluding land previously occupied by Yamanouchi) should be used for new hospital facilities, as approved, and for medical research and associated facilities. MOD 179, which refers to the site as a protected employment site, would be inconsistent with this intention and may be regarded as misleading given that permission for C2 use is extant.</p>	<p>Not Agreed</p> <p>The Inspector was made aware of the planning history relating to the land owned by the Secretary of State for Health, and the adjoining site. The Inspector stated in his report that “with regard to the permitted uses, I appreciate that, in the past, these have been restricted by dint of a Section 106 planning obligation. Restrictions on B1 uses have already been lifted from Plots B&C; and the restriction on Plot D would be ‘time expired’ before the replacement Oxford Local Plan could be adopted”. The Inspector goes on to say “be that as it may, my own assessment leads me to believe that there is no overriding case for uses within Classes B1(a) or B1(c).” The Inspector took the view that in the context of the employment restraint policy and the amount of land already in use or allocated for industrial use no need had been identified. In these circumstances the Inspector considered that this site should be allocated for Class B1(b) uses only.</p> <p>Evidence presented by the objector’s agents confirmed that, notwithstanding the planning permission for a Class C2 use, ‘the hospital project is unlikely to go ahead.’ This was the most accurate and informed advice at the time of the Local Plan Public Inquiry, which the Inspector acted upon in making his recommendation.</p> <p>The Nuffield Orthopaedic Centre made representations at the Local Plan Inquiry. Future development proposals included a new Orthopaedic and Medicine facility to be provided in the centre of the site, which has been granted planning permission. Policy DS.48 therefore supports the provision of further intensive hospital related development on their existing site in Old Road, Headington, based on the most up to date information on need identified by the NOC and assessed by the Inspector during the Local Plan Inquiry.</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 179	8.3.3 Protection of Employment Sites	Astellas (formerly Yamanouchi) / 555	<p>Objection, object to inclusion of premises formerly occupied by Yamanouchi and associated land within a new site specific policy for Littlemore Park, which seeks to limit the future use of the site to Class B1(b). The premises and land are independent of the science park and are only related to other land in Armstrong Road through the use of a common access. The premises and land do not form part of a 'Park' in the way suggested by the Inspector or in the proposed modifications. The existing premises are unrestricted as to the type of Class B1 use to which they may be put such that there is likely to be no commonality of use to warrant its inclusion in the term 'Park' any more than it would be appropriate to include the nearby housing.</p>	<p>Not Agreed</p> <p>The Inspector supported the view proposed by the agents for the adjoining land that a separate site specific policy allocation should be made for the land owned by the Secretary of State for Health and should also include the Yamanouchi site.</p> <p>The Inspector was made aware of the planning history and stated in paragraph 14.1.53 of his report that “with regard to the permitted uses, I appreciate that, in the past, these have been restricted by dint of a Section 106 planning obligation. Restrictions on B1 uses have already been lifted from Plots B&C; and the restriction on Plot D would be ‘time expired’ before the replacement Oxford Local Plan could be adopted”. The Inspector goes on to say “be that as it may, my own assessment leads me to believe that there is no overriding case for uses within Classes B1(a) or B1(c).” The Inspector took the view that in the context of the employment restraint policy and the amount of land already in use or allocated for industrial use no need had been identified.</p> <p>In these circumstances the Inspector considered that this site should be allocated for Class B1(b) uses only which would give the site a common theme. This allocation recognises its location close to the Science Park and the importance of science based research and development to Oxford’s economy</p> <p>The underlying policy position regarding the former Yamanouchi land has not changed at the Modifications stage. This land was included within the Oxford Science Park allocation (Policy DS.57) in the First and Second Draft versions of the Plan, and was subject to exactly the same policy wording (i.e. the restriction to science and technology industries concerned primarily with research and development) as is now proposed for ‘Littlemore Park’.</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 179	8.3.3 Protection of Employment Sites	RO Developments / 559	<p>Objection, object to proposals to include a site specific policy for Littlemore Park which seeks to limit the future use of the site to Class B1(b). As the prospective purchaser, concerned that this designation would prevent the development and expansion of the existing buildings on the site, which have an open Class B1 use. Site has been extensively marketed for Class B1(b) with no interest from science and technology uses. Proposal conflicts with PPG4, which seeks to ensure that development plans provide positively for enterprise and investment. Recent planning permissions have allowed open Class B1 uses on adjacent sites, so the proposed modification would be inconsistent with these decisions.</p>	<p>Not Agreed</p> <p>The Inspector supported the view proposed by the agents for the adjoining land that a separate site specific policy allocation should be made for the land owned by the Secretary of State for Health and should also include the Yamanouchi site.</p> <p>The Inspector was made aware of the planning history and stated in paragraph 14.1.53 of his report that “with regard to the permitted uses, I appreciate that, in the past, these have been restricted by dint of a Section 106 planning obligation. Restrictions on B1 uses have already been lifted from Plots B&C; and the restriction on Plot D would be ‘time expired’ before the replacement Oxford Local Plan could be adopted”. The Inspector goes on to say “be that as it may, my own assessment leads me to believe that there is no overriding case for uses within Classes B1(a) or B1(c).” The Inspector took the view that in the context of the employment restraint policy and the amount of land already in use or allocated for industrial use no need had been identified.</p> <p>In these circumstances the Inspector considered that this site should be allocated for Class B1(b) uses only which would give the site a common theme. This allocation recognises its location close to the Science Park and the importance of science based research and development to Oxford’s economy</p> <p>The underlying policy position regarding the former Yamanouchi land has not changed at the Modifications stage. This land was included within the Oxford Science Park allocation (Policy DS.57) in the First and Second Draft versions of the Plan, and was subject to exactly the same policy wording (i.e. the restriction to science and technology industries concerned primarily with research and development) as is now proposed for ‘Littlemore Park’.</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 182	8.5.1 Modernising Existing Employment Sites	Oxfordshire County Council / 449	Support , accept Inspector's view	Noted	No change to Plan
MOD 183	EC.4 Loss of Employment Sites	Oxfordshire County Council / 449	Support , accept Inspector's view	Noted	No change to Plan
MOD 202	10.5.6 Forecast Need for Extra Floorspace	Oxford Brookes University / 330	Objection , object to the proposed modification to insert paragraph 10.5.6A. Restricting the sites that Oxford Brookes University can develop precludes the consideration of windfall sites on their merits that may come forward during the Plan period, and which in all other respects may be suitable for teaching or student accommodation. Delete paragraph 10.5.6A	Not Agreed The proposed wording is that recommended by the Local Plan Inspector. He stated in paragraph 10.9.11 of his report 'for my part, I accept the logic of the Council's approach and the fact that the Plan should be founded on the basis of using sites already owned by the University or otherwise allocated for teaching, administrative or research activities by Oxford Brookes.' However, he acknowledged that in practice it might be necessary to make exceptions. Thus, he argued unless material circumstances pointed to a different solution it would be necessary to adhere to the terms of paragraph 10.5.6 [now 10.5.6A]. However, "it would be open to the University to argue that, in any particular instance, the objectives could be met, and material harm avoided, in some other way". Given the Inspector's comments, deletion of paragraph 10.5.6A is not considered appropriate.	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 213	11.3.1 Public Open Space	Oxfordshire Architectural & Historical Society / 556	Objection , we welcome the recognition of Oxford's historic cemeteries as making an important contribution to the City's public open space, though we are not quite sure that 'informal recreation' is the term to apply. Given that the City's historic urban squares and pedestrianised streets are also very important for open air enjoyment and relaxation, the sentence should be rephrased to add appropriate references.	Not Agreed Reference to the important role performed by city squares and the need to provide further squares is made in paragraph 11.3.5. It would not be appropriate to duplicate such references within paragraph 11.3.1, which is supporting text to Policy SR.5 (Protection of Public Open Space). The purpose of Policy SR.5 is to prevent the potential loss of facilities such as parks, common land and historic cemeteries to development, a situation which is unlikely to apply to urban squares and pedestrianised streets.	No change to Plan
MOD 249	12.8.2B Advertisements	Outdoor Advertising Association / 163	Support , proposed modifications in accordance with original objections	Noted	No change to Plan
MOD 250	RC.13 Advertisements	Outdoor Advertising Association / 163	Support , proposed modifications in accordance with original objections	Noted	No change to Plan
MOD 263	13.6.3 Culture and Tourist Attractions	Oxfordshire Architectural & Historical Society / 556	Objection , the amended paragraph should also include reference to the City Council's own excellent Museum of Oxford, which specifically serves to inform residents and visitors alike about the City, and provides a good range of educational activities relating to the history of Oxford.	Not Agreed Whilst the Objector's comments about the Museum of Oxford are noted and appreciated, it is not felt necessary to include reference to it within paragraph 13.6.3. Those attractions mentioned are by way of example of principal tourist attractions, not all establishments can be included.	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 292	14.2.35 Former Government Buildings Site, Marston	Oxford Centre for Islamic Studies / 486	Objection , Oxford Centre for Islamic Studies owns part of this site and has no intention of selling its holding. It would be unreasonable for the City Council to require the Centre to make the facilities on its portion of the site available solely for use by Oxford Brookes University, nor would it be in the public interest, as there would be no guarantee that OBU will wish to avail themselves of this opportunity. Suggest further amendments to paragraph 14.2.35, replacing "further purpose built student accommodation" with "associated educational residential accommodation".	Not Agreed The Local Plan allocation of this site for Oxford Brookes University was firmly supported by the Local Plan Inspector who stated in paragraph 14.33.24 that 'I am firmly of the opinion that the site should be used by Oxford Brookes University. It is a site that is ideally located in relation to this University campus; part of the site is already owned by the university, and further land is needed in order to meet the requirements of the University and the obligations under the Plan'. No further amendments to paragraph 14.2.35 would therefore be appropriate.	No change to Plan
MOD 301	DS.37 Lamarsh Road	Oxfordshire County Council / 449	Support , objection overcome	Noted	No change to Plan
MOD 302	New Paragraph Leafield Road, Temple Cowley	J.A. Pye / 390	Support , the Inspector fully recognised the development potential of the Leafield Road site, which is vacant, of no recreational or amenity value, highly accessible, in a sustainable location, in an urban area and is not greenfield.	Noted	No change to Plan
MOD 303	New Policy Leafield Road, Temple Cowley	J.A. Pye / 390	Support , the Inspector fully recognised the development potential of the Leafield Road site, which is vacant, of no recreational or amenity value, highly accessible, in a sustainable location, in an urban area and is not greenfield.	Noted	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 304	14.2.51 Littlemore Mental Health Centre	Oxfordshire Mental Healthcare NHS Trust / 562	Objection , object to deletion of the words 'key worker housing' and their replacement with 'staff accommodation for nurses and other key workers associated with the health service'. Whilst the Trust welcomes the ability to carry out such development, it is probable that it would be via the private finance initiative, and as such a restriction to health related workers may have significant impact on the willingness of lending institutions to back such a scheme, or else it would introduce such an element of risk to the project that the resultant cost would mean that the Trust could not afford the development.	Not Agreed Due to the limited amount of land available at Littlemore Mental Health Centre and the need for further health care related developments, it is not considered appropriate for land on this site to be developed for Key workers other than those associated with the health service: There is a pressing need for accommodation for health service employees in Oxford, and no evidence has been submitted to demonstrate why the restriction to health related workers would be likely to put at risk the viability of the development via PFI. The new wording, which was endorsed by the Inspector, is felt to be appropriate and should be retained in the Plan.	No change to Plan
MOD 305	DS.39 Littlemore Mental Health Centre	Oxfordshire Mental Healthcare NHS Trust / 562	Objection , as above, MOD 304, objector 562.	Not Agreed As response to MOD 304, objector 562	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 306	14.2.51B Littlemore Mental Health Centre – Field at Rear	Donnington Hospital Trust / 324	Objection , it is unduly restrictive to limit the occupancy of new development to “staff accommodation for nurses and other key workers associated with the health service”. It is too prescriptive and inflexible, and presumes against other equally suitable key workers uses coming forward during the Plan period. Delete and replace with the words ‘key worker uses’.	Not Agreed The site is unsuitable for residential uses not associated with Littlemore Mental Health Centre due to its isolated location. It could only be accessed from the A4074 or through Littlemore Mental Health Centre. The Inspector considered objections that this site should be available for a wider range of uses but concluded in paragraph 14.46.9 of his report “the general picture would be of an isolated development, poorly integrated with the rest of the City, its facilities and amenities.” He therefore endorsed the Council’s view that the field at the rear would be a logical extension of the current use (i.e. health care). He also supported the Council’s Further Proposed Changes (reflected in MOD’s 306/307), which make it clear that the allocation was for staff accommodation for nurses and other key workers associated with the Health Service. The objectors’ suggested change is therefore considered to be inappropriate.	No change to Plan
MOD 306	14.2.51B Littlemore Mental Health Centre – Field at Rear	Oxfordshire Mental Healthcare NHS Trust / 562	Objection , object to deletion of the words ‘key worker housing’ and their replacement with ‘staff accommodation for nurses and other key workers associated with the health service’. Whilst the Trust welcomes the ability to carry out such development, it is probable that it would be via the private finance initiative, and as such a restriction to health related workers may have significant impact on the willingness of lending institutions to back such a scheme, or else it would introduce such an element of risk to the project that the resultant cost would mean that the Trust could not afford the development.	Not Agreed The site is unsuitable for residential uses not associated with Littlemore Mental Health Centre due to its isolated location. It could only be accessed from the A4074 or through Littlemore Mental Health Centre. The Inspector considered objections that this site should be available for a wider range of uses but concluded in paragraph 14.46.9 of his report “the general picture would be of an isolated development, poorly integrated with the rest of the City, its facilities and amenities.” He therefore endorsed the Council’s view that the field at the rear would be a logical extension of the current use (i.e. health care). He also supported the Council’s Further Proposed Changes (reflected in MOD’s 306/307), which make it clear that the allocation was for staff accommodation for nurses and other key workers associated with the Health Service.	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 307	DS.39A Littlemore Mental Health Centre – Field at Rear	Donnington Hospital Trust / 324	Objection , As above, MOD 306, objector 324	Not Agreed As response to MOD 306, objector 324	No change to Plan
MOD 307	DS.39A Littlemore Mental Health Centre – Field at Rear	Oxfordshire Mental Healthcare NHS Trust / 562	Objection , As above, MOD 306, objector 562	Not Agreed As response to MOD 306, objector 562	No change to Plan
MOD 308	New Paragraph, Littlemore Park, Armstrong Road	The Nuffield Orthopaedic Centre NHS Trust / 554	Objection , MOD 308 does not accurately reflect the current planning position. There is an extant planning permission for a health centre and research facilities which is proposed to be taken up and this should be referred to in the text. The text should also be amended to reflect the fact that there is an outline planning permission in place for the erection of buildings for Use Class B1 purposes on the remainder, the restrictions which limit the uses to science and technology based industries being now time-expired. Amended wording suggested.	Not Agreed As response to MOD 179, objector 554	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 308	New Paragraph, Littlemore Park, Armstrong Road	Astellas (formerly Yamanouchi) 555	Objection , the existing buildings, associated car parking and ancillary land (formerly occupied by Yamanouchi) should be excluded from the provisions of the new policy as they are able to be used for the full range of Class B1 uses. The remaining land should be allocated for the full range of B1 uses in accordance with the current permission and time-expired restriction in the Section 106 Agreement. There is no evidence that it should be restricted to Class B1(b) uses as recommended by the Inspector. The site should not be protected for employment purposes alone as it does not perform a central role in the local economy.	Not Agreed As response to MOD 179, objector 555	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 308	New Paragraph Littlemore Park, Armstrong Road	RO Developments / 559	<p>Objection, object to proposals to include a site specific policy for Littlemore Park which seeks to limit the future use of the site to Class B1(b). As the prospective purchaser, concerned that this designation would prevent the development and expansion of the existing buildings on the site, which have an open Class B1 use. Site has been extensively marketed for Class B1(b) with no interest from science and technology uses. Proposal conflicts with PPG4, which seeks to ensure that development plans provide positively for enterprise and investment. Recent planning permissions have allowed open Class B1 uses on adjacent sites, so the proposed modification would be inconsistent with these decisions. Suggest amended wording to support the growth of the existing Class B1 facilities on the site</p>	<p>Not Agreed As response to MOD 179, objector 559</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 309	New Policy, Littlemore Park, Armstrong Road	The Nuffield Orthopaedic Centre NHS Trust / 554	Objection , there is an extant planning permission for a health centre and research facilities which is proposed to be taken up and this should be referred to in the text. The text should also be amended to reflect the fact that there is an outline planning permission in place for the erection of buildings for Use Class B1 purposes on the remainder, the restrictions which limit the uses to science and technology based industries being now time-expired. Amended wording suggested. The policy (MOD 309) would need to be amended accordingly.	Not Agreed As response to MOD 179, objector 554	No change to Plan
MOD 309	New Policy, Littlemore Park, Armstrong Road	Astellas (formerly Yamanouchi) / 555	Objection , the existing buildings, associated car parking and ancillary land (formerly occupied by Yamanouchi) should be excluded from the provisions of the new policy as they are able to be used for the full range of Class B1 uses. The remaining land should be allocated for the full range of B1 uses in accordance with the current permission and time-expired restriction in the Section 106 Agreement. There is no evidence that it should be restricted to Class B1(b) uses as recommended by the Inspector. The site should not be protected for employment purposes alone as it does not perform a central role in the local economy.	Not Agreed As response to 179, objector 555	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 309	New Policy, Littlemore Park, Armstrong Road	RO Developments / 559	<p>Objection, object to proposals to include a site specific policy for Littlemore Park which seeks to limit the future use of the site to Class B1(b). As the prospective purchaser, concerned that this designation would prevent the development and expansion of the existing buildings on the site, which have an open Class B1 use. Site has been extensively marketed for Class B1(b) with no interest from science and technology uses. Proposal conflicts with PPG4, which seeks to ensure that development plans provide positively for enterprise and investment. Recent planning permissions have allowed open Class B1 uses on adjacent sites, so the proposed modification would be inconsistent with these decisions. Suggest amended wording to enable the development of all Class B1 uses, including science and technology based industries.</p>	<p>Not Agreed As response to MOD 179, objector 559</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 312	DS.45 and 14.2.57 Minchery Farm, Littlemore	Firoka (Oxford Leisure) Ltd / 487	<p>Objection, the Inspector's comments based on the Council's Pre-Inquiry Changes are now out of date as conditional planning permission and listed building consent have been granted for an hotel adjacent to Michery Farm (The Priory). The draft plan should be amended to reflect the current position and the allocation either altered to include the site adjacent to The Priory as a site for an Hotel or altered such that the permission is referred to and the allocation reflects the science and technology proposals and the hotel for this part of the site.</p>	<p>Not Agreed Policy DS.45 allocated this site for commercial leisure use in the First and Second Drafts of the Local Plan, but following completion of the Ozone development Pre-Inquiry Changes were proposed to reallocate the remaining land for research and development linked to Policy DS.58. The Inspector endorsed this approach, observing that there was little value in retaining the commercial leisure allocation in the Plan. He considered that the site was not well located in terms of the sequential test set out in PPG6 for either commercial leisure or hotel development, whereas it is well located for the expansion of the Oxford Science Park allocation. In paragraph 14.50.7 of his report, he concluded that "on balance, I believe the extension of the Science Park allocation represents a more appropriate use for the site, particularly given its location on the edge of the city".</p> <p>The planning application for the hotel adjacent to The Priory was subsequently permitted in May 2005 as a departure from the emerging Local Plan, based on Members judgment about the merits of that particular case. However, this decision does not change the underlying policy position, which led the Inspector to conclude that science and technology uses would be more appropriate than a hotel on this site. Given that the hotel scheme may not necessarily be implemented, or that further revised proposals could come forward in the future, it would be inappropriate to alter the allocation now in the manner suggested by the objector.</p>	No change to Plan
MOD 322	14.2.67 Osney Mill Site and Adjacent Works, Mill Street, Osney	Oxfordshire Architectural & Historical Society / 556	<p>Support, welcome these clarifications about the historic importance of the Osney Abbey and Mill site. It should also state, as a matter of fact that it lies within the City Centre Archaeological Area.</p>	<p>Noted. It is unnecessary to state in the text that the site lies within the City Centre Archaeological Area as this is shown on the Proposals Map.</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 328	14.2.71A Oxford Science Park, Land adjacent to Minchery Farm	Oxfordshire Architectural & Historical Society / 556	Support , welcome these clarifications about the historic importance of the Minchery Farm site.	Noted	No change to Plan
MOD 328	14.2.71A Oxford Science Park, Land adjacent to Minchery Farm	Firoka (Oxford Leisure) Ltd / 487	Objection , see above MOD 312, objector 487	Not Agreed As response to MOD 312, objector 487	No change to Plan
MOD 329	DS.58 Oxford Science Park, Land Adjacent to Minchery Farm	Firoka (Oxford Leisure) Ltd / 487	Objection , see above MOD 312, objector 487	Not Agreed As response to MOD 312, objector 487	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 331	14.2.72 Oxpens Road Site	Mr J Romain / 505	Objection , policies DS.58A & DS.59 have both been modified 'to provide a greater degree of flexibility in relation to the future development' of the relevant sites but the current wording of the modified para 14.2.72 fails to show any real commitment to the option of transferring the well-established light industrial uses on the Oxpens site from their present location to the existing Becket Street Car Park or Oxford Station sites. Suggest changing new sentence to read: 'Employment – generating uses on the Becket Street car park or existing Oxford Station sites <u>should</u> replace the existing light industrial units <u>and</u> provide other business employment opportunities'.	Not Agreed The issue of whether provision should be made for the relocation of the existing light industrial uses on the Oxpens site to either Becket Street Car Park or Oxford Station was debated at the Local Plan Inquiry. The Inspector noted in paragraph 14.64.43 of his report that the developers of the Oxpens site may not be able to make such an arrangement or commitment. He concluded that "alternative premises at Becket Street or the existing station site could be a convenience; but, in the light of provision elsewhere in the city, I do not see this as a necessity". The revised wording of paragraph 14.2.72 in MOD 331 was recommended by the Inspector to ensure that the option of relocating the existing units to Becket Street Car Park or Oxford Station is kept open, but that no specific requirement for relocation is made in the Plan. This is considered to be a reasonable approach and there is no justification to change the Inspector's wording.	No change to Plan
MOD 331	14.2.72 Oxpens Road Site	Mr M Romain / 506	As above, MOD 331, Objector 505	Not Agreed As response to MOD 331, objector 505.	No change to Plan
MOD 331	14.2.72 Oxpens Road Site	Mr S Romain / 464	As above, MOD 331, Objector 505	Not Agreed As response to MOD 331, objector 505	No change to Plan
MOD 331	14.2.72 Oxpens Road Site	The Theatres Trust / 477	Support , pleased to note that the Inspector agreed with our objection and suggested the words 'performing arts' be inserted within paragraph 14.2.72. Also pleased that the Council have agreed with the Inspector's recommendation.	Noted	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 340	14.2.81 Pusey House Site, St Giles	Oxfordshire Architectural & Historical Society / 556	Support , we welcome these clarifications about the historic importance of the Pusey House site. It should also state, as a matter of fact that it lies within the City Centre Archaeological Area.	Noted It is unnecessary to state in the text that the site lies within the City Centre Archaeological Area as this is shown on the Proposals Map.	No change to Plan
MOD 355	14.2.98 St Cross College Annex, Holywell Mill Lane	Oxfordshire Architectural & Historical Society / 556	Support , we welcome these clarifications about the historic importance of the St Cross site. It should also state, as a matter of fact that it lies within the City Centre Archaeological Area.	Noted It is unnecessary to state in the text that the site lies within the City Centre Archaeological Area as this is shown on the Proposals Map.	No change to Plan
MOD 367	14.2.115, 14.2.116, 14.2.117, DS.88 Worcester Street Car Park	Oxfordshire Architectural & Historical Society / 556	Support , we welcome these clarifications about the archaeological potential of the Worcester Street Car Park site, which lies within the City Centre Archaeological Area.	Noted	No change to Plan
MOD 373	Appendix 4A Historic Environment (cross – reference list)	Oxfordshire Architectural & Historical Society / 556	Support , we welcome the inclusion of the St Sepulchre’s historic cemetery.	Noted	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 384	Glossary - 'Key Worker housing'	Oxford University Press / 416	<p>Objection, definition of 'Key Worker' should include employees of the University. The Oxford University Press is acutely aware of the continuing problem that the University has in making adequate provision for staff housing. Given the particularities of land in Oxford and the clear intent of paragraph 7.11.1 (which expressly mentions the University) it is proposed that for this City the Key Worker definition be amended to read: 'Someone employed by the National Health Service or the Universities or others employed in a frontline role delivering an essential public service where there are serious recruitment and retention problems'.</p>	<p>Not Agreed</p> <p>To specify individual groups as Key Workers is too detailed for a Local Plan. The definition in the glossary refers to groups identified by the Regional Housing Board (RHB). This allows the definition of Key Worker for the purposes of the Local Plan to include Key Worker groups as and when the RHB definition changes with local needs. The Local Plan Inspector stated "bearing in mind changing circumstances over time, there is no need to specify relevant groups of workers." (paragraph 7.2.26)</p> <p>The Regional Housing Strategy 2006-2009 states that the RHB intends to broaden the national definition to better meet the needs of the region and will work with sub-regions to develop a definition that meets local needs (paragraph 3.2.4). It is felt that referring to the RHB listing allows sufficient flexibility to ensure that local needs are considered.</p>	No change to Plan
MOD 402	Proposals Map NE.4 Landscapes of Key Significance	Oxfordshire Architectural & Historical Society / 556	<p>Objection, object to deletion from the Proposals Map of the two areas in the Cherwell floodplain, which represent essential parts of the green landscape and character of the City. Changes in agri-environmental policy have increased the potential for enhancement of such areas, especially where they are adjacent to existing areas of high conservation and historic landscapes value.</p>	<p>Not Agreed</p> <p>The deletion of Landscapes of Key Significance from the Proposals Map was recommended by the Inspector (recommendation 4.6/2 in his report). The Landscapes of Key Significance in the Cherwell Valley are in the Green Belt, apart from one very small exception, which is in the North Oxford Victorian Suburb Conservation Area. Policy NE.2 states that 'the City Council will ensure that the visual amenity of the Green Belt is not harmed by developments within or conspicuous from, the Green Belt', so it is considered that the Green Belt policy provides an adequate means of protecting the landscape character of the Cherwell Valley.</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 428	Proposals Map Leafield Road, Temple Cowley	J.A. Pye / 390	Support , the Inspector fully recognised the development potential of the Leafield Road site, which is vacant, of no recreational or amenity value, highly accessible, in a sustainable location, in an urban area and is not greenfield.	Noted	No change to Plan
MOD 430	Proposals Map Littlemore Park, Armstrong Road	The Nuffield Orthopaedic Centre NHS Trust / 554	Objection , the proposed modifications do not reflect the present position or the up-to-date context. There is an extant planning permission for a health centre and research facilities which is proposed to be taken up. There is also an outline planning permission in place for the erection of buildings for Use Class B1 purposes on the remainder, the restrictions which limit the uses to science and technology based industries being now time-expired. Proposed MOD 430 should not be adopted as a consequence of the above.	Not Agreed The Inspector supported the view proposed by the agents for the adjoining land that a separate site specific policy allocation should be made for the land owned by the Secretary of State for Health and should also include the Yamanouchi site. The Inspector considered that this site had its own separate access from Armstrong Road, distinct physical boundaries, different history and from a marketing point of view would benefit from a separate identity which should be referred to as 'Littlemore Park.'	No change to Plan
MOD 430	Proposals Map Littlemore Park, Armstrong Road	RO Developments / 559	Objection , object to proposals to include a site specific policy for Littlemore Park which seeks to limit the future use of the site to Class B1(b). As the prospective purchaser, concerned that this designation would prevent the development and expansion of the existing buildings on the site, which have an open Class B1 use.	Not Agreed The Inspector supported the view proposed by the agents for the adjoining land that a separate site specific policy allocation should be made for the land owned by the Secretary of State for Health and should also include the Yamanouchi site. The Inspector considered that this site had its own separate access from Armstrong Road, distinct physical boundaries, different history and from a marketing point of view would benefit from a separate identity which should be referred to as 'Littlemore Park.'	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
MOD 430	Proposals Map Littlemore Park, Armstrong Road	Astellas (formerly Yamanouchi) / 555	Objection , object to inclusion of premises formerly occupied by Yamanouchi and the associated land within a new site specific policy for Littlemore Park, which seeks to limit the future use of the site to Class B1(b). The premises and land are independent of the science park and are only related to other land in Armstrong Road through the use of a common access. The premises and land do not form part of a 'Park' in the way suggested by the Inspector or in the proposed modifications. The existing premises are unrestricted as to the type of Class B1 use to which they may be put such that there is likely to be no commonality of use to warrant its inclusion in the term 'Park' any more than it would be appropriate to include the nearby housing. The existing premises should be excluded from the Proposals Map.	Not Agreed The Inspector supported the view proposed by the agents for the adjoining land that a separate site specific policy allocation should be made for the land owned by the Secretary of State for Health and should also include the Yamanouchi site. The Inspector considered that this site had its own separate access from Armstrong Road, distinct physical boundaries, different history and from a marketing point of view would benefit from a separate identity which should be referred to as 'Littlemore Park.'	No change to Plan
MOD 431	Proposals Map DS.45 Land Adjacent to Minchery Farm, Littlemore	Firoka (Oxford Leisure) Ltd / 487	Objection , see above MOD 312, objector 487	Not Agreed As response to MOD 312, objector 487	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
CCD 136	NE.14 and 4.6.17 – 4.6.17A Water and Sewerage Infrastructure	J.A. Pye / 390	<p>Objection, the Council's reasons for accepting, only in part, the Inspector's recommendation are inadequate. Whilst the Council has, quite properly, accepted his recommendation regarding the deletion of any reference to developer contributions, it does not reflect on the fact that the Inspector has found that the "policy is entirely superfluous". (His letter of 21st March 2005 refers). On that basis there is no justification for the retention of the rest of the paragraph 4.6.17 as proposed. The relevance of the capacity issues associated with sewerage infrastructure for existing residents is a matter which the LPA should progress with the appropriate undertaker and not private landowners or developers in determining planning applications.</p>	<p>Not Agreed Appendix B, paragraph B4 of Planning Policy Statement 12 on Local Development Frameworks states that 'When it comes to an individual planning application, the adequacy of infrastructure can be a material consideration in deciding whether permission should be granted'. It defines infrastructure as including 'water supply and sewers'. Given this advice and the fact that there have been problems with inadequate sewage disposal including deposition in people's gardens during flooding in parts of Oxford, it is considered entirely appropriate to have a policy on water and sewerage infrastructure in the Oxford Local Plan. While it is true that the Local Plan Inspector did consider this policy to be 'entirely superfluous' it was also his view 'that there would be no actual harm in retaining this policy' in the form given in the Proposed Modifications. The City Council has been progressing improvements to sewerage infrastructure with the appropriate undertaker, but there may be cases where new developments would accentuate existing unresolved problems and for this reason it is considered that this policy should be retained.</p>	No change to Plan

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
CCD 188	HS.1 Planned Housing Growth	GOSE / 395	<p>Objection, GOSE agrees with the Inspector that the Local Plan should signpost the level of housing likely to be developed in Oxford in more detail, and on this basis objects to the proposed plan as modified. However, GOSE's objection can be overcome provided that the plan text contains a cross-reference to the fact that the indicative housing capacity for each site may be found in the latest 'Urban Potential Study'.</p>	<p>Agreed It is agreed that the objection can be overcome by a cross-reference, at an appropriate part of the text.</p> <p>It should be noted that the UPS is readily available on the City Council's website. The Annual Monitoring Report, which will also be available on the City Council's website, will contain a housing trajectory showing how the City Council is performing against its housing targets.</p>	<p>Add the following sentence at the end of paragraph 6.4A.5: <u>'A full breakdown of the assessed capacity of each allocated site is set out in the City Council's Urban Potential Study, which is available to view on the Council's website'.</u></p>

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
CCD 188	HS.1 Planned Housing Growth	Worcester College / Kier Property / 111	<p>Objection, a new Appendix should be provided, showing how the City Council anticipates that the strategic housing requirement will be achieved (including details of individual site capacity and the area of land allocated for housing). The only reason cited by Officers for not accepting this recommendation is that 'the detail contained within such a breakdown is likely to change over time and the information will soon become out of date'. This is not a valid concern. The purpose of the Appendix is to 'assist understanding' (paragraph 6.6.25 of the Inspector's Report) and enable future monitoring and review of the Local Plan. It will allow the reader to understand the assumptions made by the City Council at the time of preparing the Local Plan, and provide a basis against which to monitor actual housing completions. The information should be available in the Local Plan, and not require the reader to obtain the relevant 'Inquiry' version of the Housing Potential Study.</p>	<p>Agreed in Part</p> <p>As the objector quotes from the Inspector's Report, the purpose of the Appendix is to 'assist understanding', but it is considered that in order to fully understand how the assessment of housing capacity was made, a much more detailed document is required. The Urban Potential Study (UPS) is the most appropriate method by which to explain this. As indicated above in response to the objection from GOSE, a cross-reference will be inserted into the Local Plan at an appropriate point to draw the reader's attention to the information contained in the UPS.</p> <p>With regard to the objector's point about monitoring, it is considered that an updateable UPS allows the Local Plan to be monitored more effectively than a snapshot of information contained within an Appendix.</p> <p>It should be note that the UPS is readily available on the Council's website. The Annual Monitoring Report, which will also be available on the City Council's website, will contain a housing trajectory showing how the City Council is performing against its housing targets.</p>	<p>Add the following sentence at the end of paragraph 6.4A.5: <u>'A full breakdown of the assessed capacity of each allocated site is set out in the City Council's Urban Potential Study, which is available to view on the Council's website'.</u></p>

MOD /CCD No	Policy/ Para	Objector / Ref No.	Summary of representation	Officer response	Officer recommendation
CCD 238	HS.19 & 7.10 Houses in Multiple Occupation	John Phillips Planning Consultancy / 563	<p>Objection, the Inspector made clear that the proposed HMO boundary should be re-examined and justified. It would be inappropriate for the Council to seek to adopt an area boundary, which would form part of the development plan, merely in the interest of expediency rather than seeking to justify it appropriately following careful analysis (which has not so far been undertaken). If the Council does not wish to accept the comments of the Inspector it should amend the Policy such that it reads that 'the Council will undertake surveys in respect of East Oxford with a view to designating an appropriate area in which HMO's will be strictly controlled. Once designated within this area planning permission for an HMO would only be granted if it can be shown that no harm would be caused or significant benefits result.'</p>	<p>Not Agreed</p> <p>As explained in the City Council's Statement of Decisions and Reasons, the boundary review would be a long and complex task and so it would not be sensible to delay the adoption of the Plan for what could be a lengthy period.</p> <p>In the meantime, it is considered that in the interim prior to the resurvey, there is adequate justification for using the HMO Registration Area as the boundary. The Environmental Health Section has designated the current HMO boundary and is undertaking careful analysis of the area.</p> <p>In accordance with the Inspector's comment in paragraph 7.25.33 of his Report, it would be open to applicant's to argue that, in any particular road within the Registration Area, there would be no significant harm. It is considered that this gives enough flexibility to the policy, while also recognising the current high concentration of HMOs that exist within East Oxford.</p> <p>It would be inappropriate to designate a boundary outside the Local Plan / LDF process. By including in the Local Plan, it has development plan status.</p>	No change to Plan