

#### **4. TRANSPORT AND MOVEMENT**

*I address all objections relating to the transport strategy for Witney in Chapter 9.*

##### **GENERAL ISSUES**

**Objections** 17/22, 104/177, 301/482, 552/969, 970, 977, 577/1184-1088, 1213, 595/1363, 646/1507

##### **Issues**

- (a) Whether the plan should make provision for cheap and frequent bus services and restrict car access to the central area of Witney.
- (b) Whether the plan should include a strategy setting out improvements to be made to roads and public transport to cater for the additional housing.
- (c) Whether the plan should include a policy safeguarding sites for storage and distribution uses in locations served, or with potential to be served, from railway sidings.
- (d) Whether new roadside service facilities should be provided at the proposed Downs Road/A40 junction.
- (e) The provision of signs on the A40 directing tourists to Witney.
- (f) Is the policy guidance in PPG13 relating rural transport issues reflected in the plan?
- (g) Paragraphs 1.7 and 1.8. Should the plan include reference to the supply, control and management of parking and indicate that park and ride sites are not a destination in their own right?

##### **Conclusions**

4.1 Combined with improvements to public transport, restricting vehicular access to the central area of the town may encourage people to leave their cars at home but equally it could lead to parking and congestion problems elsewhere. (22) Policies T3 and T5 support the Local Transport Plan’s objective of ensuring that frequent, reliable and high quality services are available within all the major settlements in the county (CD3/17). However, the provision of cheap and frequent bus services is not within the remit of a Local Plan. (22) Nor is signage on the A40 (977) but paragraph 1.2 should be modified to reflect that the A40 is now the responsibility of the County Council. (1184)

4.2 Policy T4 sets out the major highway schemes proposed in the District but the appropriate vehicle for a District wide strategic transport policy is the Structure Plan. (1507)

4.3 Policy T15 of the Structure Plan states that freight distribution centres should be located with direct access to the rail network and in or, adjoining major settlements. None of the Districts main towns have access to the rail network.

Neither Tackley, on the Oxford to Banbury line nor any of the villages on the Cotswold line would be suitable locations for large storage and distribution uses. (482)

4.4 It is not necessary to replicate Structure Plan Policy T15 in paragraph 4.12. Paragraphs 4.12 to 4.16 neither justify nor explain a policy and paragraph 4.16 strays beyond reasoned justification and is almost a statement of policy. There are other policies in the plan under which any proposals for freight and distribution uses can be assessed and, in my view, paragraphs 4.12 to 4.16 should be deleted. (969)

4.5 In the absence of any evidence to the contrary I see no reason to doubt the Council’s claim in *CDI/27* that no need has been identified for additional roadside services on the A40 near Witney. (970) Paragraph 4.17, rather than explaining the need for a policy seeks to justify the lack of one. In addition, a Local Plan should concern itself with policies and proposals for the development and use of land, it is not a guide for motorists regarding the location of services. For these reasons, I recommend that paragraph 4.17 be deleted.

4.6 The objectives for transport and movement in the District set out in paragraph 1.7 generally accord with PPG13. The influence of these themes can be found throughout the plan, particularly in the introduction to Chapter 4, Policy T1 and its reasoned justification and in policies relating to the location of housing, employment and tourist development. (1363)

4.7 English Nature’s request that paragraph 1.4 reflect the impact of new road building on habitats is dealt with by Amendment No. 80. (177) Amendment nos. 81 and 82 address requests for minor changes made by the County Council to paragraphs 1.6 and 1.8. (1185, 1187) Policy BE3 and Appendix Two of Chapter 4 deal with the provision of parking spaces to serve new development and Policy T8 relates to the provision of new car parks. I agree with the Council that a Local Plan is not the appropriate vehicle to deal with the management of parking spaces and that it is not necessary for the plan to duplicate Policy T7 of the Structure Plan. (1186, 1213)

4.8 Oxford’s park and ride sites are not destinations in their own right but the location of these facilities means that most people living to the north and west of Oxford travel on the A40 and A44 to reach them. (1188) This is a matter of fact and a relevant precursor to the policies that follow.

## **RECOMMENDATION**

4.9 **R4.1 Modify paragraph 1.2 to reflect that responsibility for the A40 now lies with the County Council.**

4.10 **R4.2 Make no modification with respect to the inclusion of policies restricting vehicular access to the central area of Witney or promoting cheap and frequent bus services.**

4.11 **R4.3 Make no modification with respect to the inclusion of policies seeking improved signage for Witney on the A40 or the provision of roadside services at the Downs Road junction of the A40.**

- 4.12 **R4.4 Delete paragraph 4.17.**
- 4.13 **R4.5 Make no modification with respect to the inclusion of a district- wide strategic transport policy.**
- 4.14 **R4.6 Make no modification with respect to the inclusion of a policy safeguarding sites for storage and distribution uses.**
- 4.15 **R4.7 Delete paragraphs 4.12 to 4.16.**
- 4.16 **R4.8 Make no modification to paragraph 1.7.**
- 4.17 **R4.9 Make no modification to paragraph 1.8.**

#### POLICY T1 – TRAFFIC GENERATION

**Objections** 104/178, 146/229, 276/1473, 509/773, 522/832, 526/869, 576/1153, 645/1496

#### **Issues**

- (a) Would further expansion of Carterton conflict with this policy?
- (b) Whether the policy should reflect that many rural villages have limited public transport links and most inhabitants are dependant upon cars.
- (c) Should the plan define significant traffic generators?
- (d) Whether the plan should discriminate in favour of redevelopment proposals which would lead to a marked reduction in traffic levels.
- (e) Whether the policy should identify the need for development to be located where it will maximise travel by means other than the private car, in order that a sequential assessment of competing development proposals can be developed.
- (f) Should paragraph 2.6 state that development must also satisfy environmental criteria.

#### **Conclusions**

4.18 My conclusions regarding the road network around Carterton are set out in Chapter 10. (229, 1496) The Council accept that most traffic from Carterton heads east towards the A40 and Oxford and whilst the problems of congestion on that road are well documented the Highway Authority do not object to any of the allocated or omission sites in the town. Carterton Proposal 1 and Policy E1 make provision for employment in the town which should provide local job opportunities and reduce out commuting.

4.19 Buses will be affected by congestion but this does not take away from the fact that Carterton is linked to Witney and Oxford by a number of bus services (CD4/43). I find against the expansion of Carterton Proposal 1 on landscape rather than traffic

grounds (paragraphs 10.2 to 10.5) and I do not consider that Carterton Proposals 1 or 5 conflict with Policy T1. (229, 1496)

4.20 The plan takes a realistic view of transport choices in the rural area. To relax Policy T1 to allow development which would generate significant levels of traffic in locations where there is no alternative to the car would conflict with PPG13. (1473, 832)

4.21 Common sense suggests that a large housing or industrial estate is likely to generate significant levels of traffic. In addition, the Policy aims to direct development to the most sustainable locations, not to provide an indication of when a transport assessment will be required. (869) The Council have used the work underpinning documents such as ‘Fringe Sites’ (CD/43) and ‘Reducing the Need to Travel’ (CDI/37) to inform their choice of location for new growth and I do not consider it necessary to include a policy designed to assess competing development proposals. (1153)

4.22 I have no doubt that should redevelopment or a new use of land lead to a reduction in traffic levels this would be a material consideration in the determination of a planning application. However, the plan should not elevate such a consideration above other matters which may be taken into account. (773)

4.23 Paragraph 2.1 indicates that proposals for development should satisfy environmental as well as other locational criteria and I do not consider it necessary to repeat this in paragraph 2.6. (178)

## **RECOMMENDATIONS**

4.24 **R4.10 Make no modification to Policy T1.**

4.25 **R4.11 Make no modification to paragraph 2.6.**

## **POLICY T2 – PEDESTRIAN AND CYCLE FACILITIES**

**Objections** 39/48, 551/956, 577/1189, 1190

### **Issue**

Whether the policy should require:

- i the provision of more cycle parking spaces in Witney,
- ii that cycle routes should connect residential areas to places people want to visit,
- iii cycle routes to be segregated from cars so as to be safe and attractive, and
- iv that obstacles such as kerbs, dismounts and non priority crossings be discouraged to ensure that cycle routes provide a faster alternative to the car.

## **Conclusions**

4.26 The policy and its reasoned justification recognise the need to provide safe and attractive routes to where people work, shop and play. The detail of how this will be achieved, including the design of new cycle routes and improvements to existing facilities will be a matter for the Local Transport Plan (*CD3/17*) and detailed schemes as and when they arise. (*48, 956*)

4.27 Amendment Nos. 83 and 84 address requests for minor changes made by the County Council to paragraphs 3.3 and 3.5. (*1189, 1190*)

## **RECOMMENDATION**

4.28 **R4.12 Make no modification to Policy T2.**

## **POLICY T3 – PUBLIC TRANSPORT INFRASTRUCTURE**

**Objections** 5/7, 34/41, 3565, 84/110, 301/480, 523/849, 558/1060, 571/1126, 577/1212, 1191-93, 618/1411, 1412, 640/1465, 314/3563, 983/3397

## **Issues**

- (a) The policy is not a land use policy and should be deleted.
- (b) Lack of proposals for a rail link between Witney, Carterton and Oxford.
- (c) The Council’s opposition to the A40 Bus Lane proposal.
- (d) The promotion of an extension of the Guided Transit Express.

## **Conclusions**

4.29 The House Builder’s Federation’s objection led to Amendment No. 85. I am satisfied that, as amended, the Policy relates to the development of land and so accords with the advice in PPG12. (*1126*)

4.30 PPG12 advises that plans should only include proposals for major road and railway projects which are firm and have a reasonable degree of certainty of proceeding within the plan period. A rail link between Carterton, Witney and Oxford may solve many ills but there is no such proposal in the Structure Plan (*CD3/1*) or Local Transport Plan (*CD3/17*). To include a policy in this plan would conflict with the advice in PPG12. (*7, 41, 1060, 1411, 1465*).

4.31 Amendment no. 88 updated the Council’s position and at the same time dealt with the County Council’s objection with respect to the A40 bus lane. (*849, 1212*). In response to objections pursued at the Inquiry the Council suggested that paragraph 3.9 be modified by replacing all bar the first sentence with a statement regarding the status of the GTE as set out in the Local Transport Plan. (*3397, 3563, 3565*) I suspect events will have moved on since then and recommend that the paragraph be modified accordingly.

4.32 Amendment nos. 86, 87 and 89 address requests for minor changes made by Railtrack and the County Council to paragraphs 3.7, 3.8 and 3.10. (480, 1191, 1192, 1193) References to Railtrack have been replaced by Network Rail. (110)

## **RECOMMENDATION**

4.33 **R4.13 Make no modification to Policy T3**

4.34 **R4.14 Bring paragraph 3.9 up to date with respect to the GTE and other measures designed to address the problems of traffic congestion on the A40.**

## **POLICY T4 – MAJOR HIGHWAY SCHEMES**

**Objections** 4/6, 10/12, 20/25, 21/26, 29/35, 32/38, 50/62, 81/100, 84/113, 114, 99/142, 127/209, 136/230, 155/249, 180/291, 252/394, 395, 262/408, 319/526, 326/538, 523/850, 552/965, 558/1061, 577/1194, 1195, 1218, 585/1284-88, 638/1455

### **Issues**

4.35 Objections relating to the inclusion or omission of highway schemes first raise the issue of whether protecting the routes of the proposed roads accords with the advice in PPG12. Objections to the North East Distributor, West End Link, Downs road junction and omission of a 4 leg junction at Shores Green are addressed primarily in Chapter 9 although I comment briefly below on the issue of safeguarding. Firstly, I consider the following schemes:-

- (a) Carterton A40 Access Road
- (b) A44 Woodstock bypass
- (c) Sutton bypass
- (d) Shilton Dip Improvement
- (e) Burford bypass
- (f) Carterton Town Centre Link Road
- (g) The omission of a proposal for a bypass around Chipping Norton.
- (h) The omission of a proposal to dual the A40 between Witney and Oxford.
- (i) The omission of a proposal to provide a 4 way junction on the A40 at Minster Lovell

### **Conclusions**

4.36 I say below why I consider all road schemes outside Witney set out under Policy T4 should be deleted. However, if my recommendations are not accepted at the very least the policy and its reasoned justification should be modified to reflect the completion of the Carterton A40 Access Road (113, 230).

4.37 The advice in paragraph 5.17 of PPG12 is unequivocal. Plans should only include proposals for major road schemes which are firm, have a reasonable degree of proceeding within the plan period and should be identified as such in the Local

Transport Plan. The advice in paragraph 5.22 regarding safeguarding routes and blight is also pertinent.

4.38 I heard that Horsefair in Chipping Norton suffers from high levels of air pollution which is attributed principally to the numbers of lorries passing through the town. However, there is no proposal to construct a bypass in the Structure Plan (CD3/1) or Local Transport Plan (CD3/17) (12). The same applies to the 4 way junction proposed by an objector at Minster Lovell. (394)

4.39 Annex 3 of the report by the County Council’s Head of Transport ‘Transport Network Review’ (CD3/55) indicates that dualling of the A40 will be considered after 2021, provided the A40 strategy does not resolve congestion, appropriate access to the A34 can be delivered and congestion problems at the junction of the A34 and M40 have been dealt with. (26, 38, 395, 965)

4.40 One of the recommendations of the County's Transport Networks Review, Final Report (CD3/56) is that Woodstock bypass, Sutton bypass and the improvements to Shilton Dip be deleted from the pool of retained highway schemes. Nevertheless, the County Council ask that the lines of these routes be protected pending consultation on the emerging Local Transport Plan (CD3/62). These schemes are identified in the current Local Transport Plan but the Woodstock bypass is listed as a scheme which is not currently included in the construction programme. (6, 62, 100, 142, 249, 291, 408, 526, 538, 850, 1284-8)

4.41 The Local Transport Plan states that Sutton bypass and works to Shilton Dip are to be funded by development. From what I heard at the Inquiry, it seems unlikely that further development at Carterton Proposal 1 would fund a bypass at Shilton Dip and it would appear that the Council are relying on securing funding from other developments in Carterton. (see paragraph 10.17) (394.) The Plan at paragraph 3.17 indicates that funding for the Sutton bypass is to come from '*gravel operations and any other sizable developments in the area*'. I have neither seen nor heard anything to indicate that development will come forward in this plan period of a size, type or in a location to fund either scheme.

4.42 Turning to Burford, plans for an eastern bypass have been abandoned. The Plan at paragraph 3.25 tells us that the '*Local Transport Plan includes a proposal to investigate traffic solutions in Burford which may include a bypass*'. Annex 3 to CD3/55 indicates that these investigations are not likely to commence before 2006 and, if justified, works are not likely to start until sometime after 2021. A Local Plan is not the appropriate vehicle to pursue traffic regulation orders but residents may be relieved to hear that the County Council consider that a traffic management plan needs to be developed for inclusion in the short term programme. (25, 35, 209, 1061, 1455)

4.43 The Carterton Town Centre Link Road is carried over from the adopted plan. It is not included in the Local Transport Plan and funding is dependent on contributions from developments in the town centre (82, *Carterton Proposal 6, Chapter 10*). (114) I heard at the Inquiry that the County Council have undertaken to build the extension of the Carterton A40 Access Road to Witney Road but only if it is found to be necessary and, as acknowledged in the plan, there is no funding.

4.44 Amendment Nos. 90 to 92 address modifications requested by the County Council. (1194, 1195, 1218) However, not one of the above schemes can be said to be firm or have a reasonable chance of proceeding within the plan period and to include or retain them would conflict with the advice in paragraph 5.17 of PPG12.

4.45 As for the Witney schemes, I conclude in paragraph 9.48 of this report that both the Cogges Link (CLR) and the northern section of the West End Link (WEL(2)) roads should remain safeguarded under policy T4 although there remains very considerable doubt about their timing. Indeed, I conclude that the CLR should not be pursued whilst the option of improvements to the Shores Green junction is evaluated. It is also likely that WEL(2) will not be developed before 2011 without a change of strategy by the County Highway Authority. The PPG12 guidance would suggest the deletion of both schemes. However, the situation in Witney is unusual and it is important at this stage that no options be closed pending review through the LDF process. Consequently, I have decided that the two schemes should remain safeguarded but that Witney Proposal 10 be deleted in its entirety with the explanatory text included under paragraph 3.15 in chapter 4.

4.46 It might seem logical in the circumstances to safeguard land at Shores Green to keep that option open pending review. However, because the scheme has not been identified in the Local Transport Plan and there is, as yet, no commitment to it, it would not be consistent with PPG12 advice to include it under policy T4. I am also aware that the land is controlled by the Mawle Trustees, part of the East Witney Land Consortium, who have a direct interest in keeping this option open pending review.

4.47 I was given to understand that contracts had been let for the construction of the southern section of the West End Link. In the circumstances it is only the northern section which needs to remain safeguarded. The North-Eastern Distributor is complete and no longer needs to be referred to in this plan. (26) This leaves the A40 Downs Road junction. The phasing of the North Curbridge Development until after 2011 may mean that finance is not available to construct this junction within the plan period except through the Local Transport Capital Programme. The scheme is in the LTP and its safeguarding would complement Witney Proposal 11.

## **RECOMMENDATIONS**

4.48 **R4.15 Delete the following highway schemes listed in Policy T4:**

- a. **Carterton A 40 Access Road**
- b. **Shilton Dip Improvement (B4020)**
- c. **Sutton Bypass (B4449)**
- d. **A44 Woodstock Bypass**
- e. **Carterton Town Centre Link Road**
- f. **Burford Bypass**
- g. **Witney – North East Distributor**

**and modify the reference to the Witney – West End Link by the addition of the words - (northern section)**

- 4.49 **R4.16** Modify paragraphs 3.12 to 3.14 to reflect the deletion of schemes a. to f. in R4.16
- 4.50 **R4.17** Expand paragraph 3.15 to include explanatory text to justify the safeguarding of the Witney schemes taken from the (deleted) text in paragraphs 4.7-4.10 of plan chapter 9 taking account of my conclusions on these schemes in chapter 9 of this report and the position with regard to a review of local highway schemes by way of a Core Strategy DPD prepared under the 2004 Act. (*see also R9.2 and R9.4*)
- 4.51 **R4.18** Delete paragraphs 3.16 to 3.25.
- 4.52 **R4.19** Make no modification to the plan with respect to the inclusion of a bypass around Chipping Norton, dualling the A40 between Witney and Oxford and a 4 way junction at Minster Lovell.

#### POLICY T5 – INTERCHANGE FACILITIES

**Objections** 551/954, 576/1155, 577/1214, 300/3385, 576/3481, 589/3441, 643/3545

#### **Issue**

The appropriateness of including a specific reference in the plan to the provision of a park and ride site at North Curbridge or, alternatively, to the east of Witney.

4.53 The policy itself says very little. It does not give any guidance as to where any park and ride facility for Witney might be located. It is in the supporting text, paragraph 3.28, where reference is found to the possibility of a site as part of the North Curbridge development and that links to part viii. of Witney Proposal 6 (see paragraph 9.64 of this report).

4.54 The amendments made in the revised deposit plan were intended to clarify that it is a Local Plan proposal to include park and ride provision at North Curbridge, not part of the Local Transport Plan. Such clarification was clearly necessary. However, it became apparent during discussions about the relative merits of the North Curbridge proposal compared to alternatives that the matter of a park and ride site should not be a factor which weighed in favour of North Curbridge, or indeed the need to provide a four leg junction with the A40 at Downs Road. An alternative park and ride site was suggested as part of the East Witney proposals but had not been put forward at first deposit stage. I have not given any weight to the suggestion.

4.55 It is clearly premature to consider any particular site for a park and ride facility until further studies are undertaken. However, once identified I would expect the site to be identified in the plan. It will now be a matter for consideration as part of the Local Development Framework.

4.56 I consider that the most appropriate response is to reverse amendment no. 93 to paragraph 3.28 but not to include the deleted words from the first deposit draft plan. The text will not then make any reference to the site.

## **RECOMMENDATION**

**4.57 R4.20 Modify paragraph 3.28 in chapter 4 by the deletion of the additional wording introduced in the revised deposit draft plan by amendment no. 93 and highlighted in red.**

## **POLICY T6 – TRAFFIC MANAGEMENT**

**Objections** 29/35, 84/107, 281/430, 571/1127, 526/866, 552/968, 577/1196, 558/1063, 594/1344

### **Issues**

- (a) Whether paragraph 4.2 amounts to obtaining planning gain.
- (b) Whether the reasoned justification should provide more guidance on the type of development proposal for which traffic management measures will be sought and what developments will be expected to provide.
- (c) Pedestrianisation of Witney Town Centre.
- (d) Should paragraph 4.5 be modified to indicate that the parking requirements of disabled people should be taken into consideration in the design of Home Zones.
- (e) Whether the policy should include a routeing strategy for HGVs and an Integrated Transport Strategy.

### **Conclusions**

4.58 I see nothing in paragraph 4.2 which conflicts with the advice in Circular 1/97. (866) I agree with the Council that it is not possible to list all the traffic management or other measures which may be required to facilitate the range of development proposals it is likely to be faced with. (968, 1127) The responsibility for the production of a district wide strategy falls to the County Council through the Structure Plan and the Local Transport Plan. (107)

4.59 Amendment no. 94 addresses a request for a minor change to paragraphs 4.3 by the County Council. (1196) Contrary to the concerns of the Town Council paragraph 4.5 does not propose the pedestrianisation of Witney town centre. (968) Strategies for routeing HGVs and the making of traffic regulation orders fall outside the remit of a Local Plan. (35, 430, 1063) Guidance on the design of Home Zones produced by the County Council requires account to be given to the needs of the disabled (CD3/37) (1344).

## **RECOMMENDATIONS**

**4.60 R4.21 Make no modification to Policy T6.**

**4.61 R4.22 Make no modification to paragraphs 4.2 or 4.5.**

## POLICY T7 – TRAVEL PLANS

**Objections** 576/1156, 577/1197

### **Issue**

Whether the policy should be expanded to include the role Travel Plans can play in identifying sustainable residential development.

### **Conclusions**

4.62 PPG13 advises that travel plans should be submitted alongside planning applications which are likely to have significant transport implications. Nothing in the PPG says they should be used as a tool for identifying sustainable locations but nor does it state that they do not apply to residential development. The policy and the reasoned justification should be modified to reflect this. (1156)

4.63 Amendment No. 95 addresses a request for a minor change made by the County Council to paragraphs 4.6. (1197)

## **RECOMMENDATION**

4.64 **R. 4.23 Modify Policy T7 and its reasoned justification by making reference to the need to submit travel plans in support of proposals for residential development that are likely to have significant transport implications.**

## POLICY T8 – NEW OFF-STREET PUBLIC CAR PARKS

**Objections** 61/75, 350/566, 374/595, 394/617, 397/621, 402/630, 403/633, 594/1345, 638/1456,

### **Issues**

(a) Whether the policy should make provision for additional parking in Woodstock and Burford.

(b) The provision of disabled parking spaces to facilitate access to retail premises.

### **Conclusions**

4.65 The purpose of the policy is not to make provision for additional car parks but to set out the conditions under which proposals for new ones would be permitted. I have no evidence regarding Burford but I heard uncontested evidence at the Inquiry with respect to problems in Woodstock. However, providing additional parking is likely to encourage the use of the private car, undermining the aims of sustainable development. In addition, there are ways of controlling demand and managing the use of spaces and there is insufficient evidence or before me to justify a

recommendation to provide new car parks in either case. (75, 566, 617, 621, 630, 633, 1456)

4.66 ‘Inclusive Mobility, A guide best practice on access to pedestrian and transport infrastructure’ (Department of Transport) states that provision should be made for car parking spaces for disabled motorists wherever conventional parking spaces are provided. This goes further than Note 6 to Appendix Two which does not require all car parks to make provision for the disabled. Advice on the number and location of spaces that should be provided can be found in Traffic Advice Leaflet 5/95. I would expect this advice to be material to the consideration of any proposals for or including car parking. (1345)

4.67 There are duly made objections to this policy and I consider that it would benefit from modifications to its wording as set out below. Whilst I appreciate that paragraph 4.11 addresses problems in Woodstock and Burford it essentially repeats the second sentence of the preceding paragraph and is unnecessary.

## **RECOMMENDATIONS**

4.68 **R4.24 Modify Policy T8 as follows:**

**Proposals for new off street car parking areas will be permitted where:**

- a) they would ensure the continued vitality and viability of a town centre or other facilities attracting visitors, or**
- b) the local environment is being seriously damaged by on street parking and alternative parking provision is essential.**

4.69 **R4.25 Delete paragraph 4.11.**

4.70 **R4.26 Modify Note 6 to Appendix Two to indicate that provision should be made for car parking spaces for disabled motorists wherever conventional parking spaces are provided.**

OMISSION – AIRFIELDS

**Objections** 624/1441, 577/3640, 624/3220

### **Issues**

- (a) The omission of a policy regarding the location of sites for aviation activities.
- (b) The omission of a policy regarding safeguarded areas

### **Conclusions**

4.71 Although presented as reasoned justification paragraph 4.19 (amendment no. 97) reads as a statement of policy and the Council should be clear whether or not to

include a policy in this regard. PPG13 does not require development plans to include policies regarding the provision of airfields and I am satisfied that the plan as a whole contains the tools necessary to consider any proposals which may be submitted. (1441, 3220) Paragraph 4.18 is a statement of fact and is unnecessary.

4.72 The development plan should be read as a whole and it is not appropriate to use it for any form of ‘lobbying’. Thus it would be inappropriate to refer to the County Council’s opposition to a new international airport in Oxfordshire. Nor do I consider it necessary for the plan to repeat government guidance regarding the establishment of airfields on greenfield sites. (3640)

4.73 The plan does lack a policy regarding safeguarded areas and a policy should be included in accordance with the advice in Annex 2 to Circular 1/2003. This will also require modifications to the Proposals Map.

## **RECOMMENDATION**

4.74 **R4.27 Replace paragraphs 4.18 and 4.19 with a new policy reflecting the advice in paragraph 28 of Annex 2 to Circular 1/2003 and modify the Proposal Map accordingly.**

## **APPENDIX TWO – PARKING STANDARDS**

**Objections** 529/877, 554/1005, 578/1250, 504/3534, 554/3421

### **Issues**

- (a) The omission of a policy dealing with car parking standards.
- (b) The lack of standards relating to sheltered retirement housing.
- (c) Whether the standards accord with guidance in PPG3.

### **Conclusions**

4.75 Policy BE3(d) requires new development to provide parking in accordance with the standards set out in Appendix Two. (1005) There are many types of development not included in the Appendix and in those cases I would expect developers and the Council to take account of the advice in PPGs 3 and 13. I do not see that it is necessary to include a standard for sheltered retirement housing. (1250)

4.76 The standards are expressed as a maximum, nevertheless those relating to residential development would allow developers to provide more than the average 1.5 spaces per dwelling set out in PPG3. Contrary to paragraph 2.26 of Chapter 3, nothing in paragraph 60 of PPG3 says that any significant reduction below the maximum standard must be justified. Indeed, the PPG advises that developers should not be required to provide more spaces than they may wish. I consider that should the standard and paragraph 2.26 of Chapter 3 remain unchanged there is a significant danger that it will undermine the drive to create sustainable residential environments. (1250, 3534, 3421)

4.77 The cycle parking standards have been reviewed since WM Morrison objected to what I agree were unduly onerous requirements. (877) Most people would not do their weekly shop by bike and, to my mind, the number required to serve a large food store is likely to be far higher than is necessary. However, their provision may encourage employees and some shoppers to cycle and in that regard it is perhaps better to have too many than too few.

#### **RECOMMENDATIONS**

- 4.78 **R4.28 Replace the parking standard for residential development in Appendix Two with a requirement which accords with the advice in PPG3.**
- 4.79 **R4.29 Delete the last four sentences of paragraph 2.26 of Chapter 3.**
- 4.80 **R4.30 Make no modification with respect to the inclusion of a parking standard relating to sheltered retirement housing.**
- 4.81 **R4.31 Make no modification with respect to cycle parking standards for food retail stores.**