



WEST OXFORDSHIRE
DISTRICT COUNCIL

Topic Paper

West Oxfordshire Local Plan 2031 Housing Site Selection Paper

June 2017

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I. INTRODUCTION

- 1.1 The Pre-Submission Draft West Oxfordshire Local Plan 2031 (including proposed modifications) published in November 2016 includes 20 housing site allocations.
- 1.2 There are five Strategic Development Areas (SDAs) including:
- Land to the east of Witney (450 homes)
 - Land to the north of Witney (1,400 homes)
 - Land to the east of Chipping Norton at Tank Farm (1,400 homes)
 - Land west of Eynsham (1,000 homes)
 - West Oxfordshire Garden Village (2,200 homes)
- 1.3 There are 15 'non-strategic' housing allocations including:
- REEMA North and Central, Carterton (300 homes)
 - Milestone Road, Carterton (200 homes)
 - Land at Swinbrook Road, Carterton (70 homes)
 - Land north of Jefferson's Piece, Charlbury (40 homes)
 - Land east of Woodstock (300 homes)
 - Land north of Hill Rise, Woodstock (120 homes)
 - Land north of Banbury Road, Woodstock (250 homes)
 - Land north of Woodstock Road, Stonesfield (50 homes)
 - Land east of Burford (85 homes)
 - Land at Myrtle Farm, Long Hanborough (50 homes)
 - Oliver's Garage, Long Hanborough (25 homes)
 - Former Airfield, Stanton Harcourt (50 homes)
 - Land south of Milton Road, Shipton under Wychwood (44 homes)
 - Land west of Minster Lovell (85 homes)
 - Woodford Way Car Park, Witney (50 homes)
- 1.4 The purpose of this topic paper is to explain in detail the process which the District Council has followed in identifying these site allocations and how the overall spatial strategy of the Local Plan has been considered and complied with in identifying the sites.
- 1.5 The paper also deals with the issue of development within the Cotswolds Area of Outstanding Natural Beauty (AONB) in particular the extent to which 'exceptional circumstances' exist to justify major development within the AONB in accordance with national policy set out in the NPPF.
- 1.6 The topic paper has been prepared in response to a number of issues raised during the Stage Two Local Plan examination hearing session held on Tuesday 9 May 2017.

- 1.7 It has been published and made available as part of the Local Plan examination and will be used to inform discussions at the Stage 3 examination hearing sessions which are due to commence on 11 July 2017.

2. NATIONAL POLICY AND GUIDANCE

2.1 Government policy¹ sets out how local authorities should approach the selection of sites for development.

2.2 It states that Local Plans should:

- Plan positively for the development and infrastructure required in the area
- Indicate broad allocations for strategic development on a key diagram and land-use designations on a proposals map
- Allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate

2.3 More detail on site selection is set out in National Planning Practice Guidance² – in particular the section on housing and economic land availability assessments. The guidance says that such assessments should:

- Identify sites and broad locations with potential for development
- Assess their development potential
- Assess their suitability for development and their likelihood of development coming forward (the availability and achievability)

2.4 At the heart of this process is the preparation of the Strategic Housing Land Availability Assessment (SHLAA). A parallel process for the assessment of land for economic development may also be undertaken – the Strategic Employment Land Availability Assessment (SELAA). Where combined into one assessment, these are presented as a Strategic Housing and Employment Land Assessment (SHELAA).

2.5 Importantly, such assessments provide a comprehensive formal assessment of the suitability of land for development in a Local Authority area. Whilst they do not allocate sites directly, they do provide important background evidence to inform the allocation of sites within a Local Plan alongside other technical evidence including Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA).

¹ National Planning Policy Framework – NPPF (paragraph 157)

² <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

3. BACKGROUND – WEST OXFORDSHIRE LOCAL PLAN

- 3.1 The current West Oxfordshire Local Plan was adopted in June 2006 and although it is now time-expired, the majority of policies have been formally saved under transitional arrangements and continue to be used for development management purposes (i.e. the determination of planning applications).
- 3.2 Work on a replacement Local Plan began in 2008 with the publication of ‘issues and options’ papers for an overall ‘Core Strategy’ development plan document (DPD) and a separate ‘Site Allocations’ development plan document (DPD).
- 3.3 The intention at that time was that the Core Strategy DPD would identify large, ‘strategic’ sites whereas the Site Allocations DPD would identify smaller, ‘non-strategic’ sites.
- 3.4 The overall timeline up until the proposed Local Plan modifications were published in November 2016 is summarised in the table below. For reference purposes this includes a brief summary of the approach taken towards housing site allocations at each stage.
- 3.5 It should be noted that limited consultation took place on the Site Allocations DPD in 2008, only with the focus shifting to the Core Strategy (now Local Plan) thereafter.

TABLE 1 : Local Plan preparation timeline

Consultation Document/Stage	Approach taken towards site allocations
Core Strategy ‘Issues and Options’ ³ (March 2008)	Views sought on the overall spatial strategy together with a number of ‘open’ questions on potentially suitable sites but no specific allocations proposed.
Site Allocations ‘Issues and Options’ ⁴ (March 2008)	Views sought on 94 sites submitted to the Council as potentially suitable for housing. This included both larger ‘strategic’ sites and smaller ‘non-strategic’ sites. No specific allocations proposed.
Site Allocations: Issues & Options Further sites consultation ⁵ (July	Views sought on 40 additional sites submitted to the Council as potentially suitable for housing in response to the Issues and

³ <http://www.westoxon.gov.uk/media/81714/Issues-and-Options-document.pdf>

⁴ <http://www.westoxon.gov.uk/media/82131/Site-allocation-issues-and-options-consultation-March-2008.pdf>

Consultation Document/Stage	Approach taken towards site allocations
2008)	<p>Options consultation in March 2008.</p> <p>This included both larger 'strategic' sites and smaller 'non-strategic' sites. No specific allocations proposed.</p>
Core Strategy So Far: Interim Position Statement ⁶ (February 2009)	<p>West Witney strategic development area identified for around 1,000 homes and at least 10 ha of business land.</p> <p>Included an assessment of alternative options to the north-west, north, north-east, east and south of Witney but no other allocations proposed.</p> <p>No options identified at Carterton or Chipping Norton.</p> <p>Brief consideration of the potential for development to the west of Eynsham and to the south east of Woodstock.</p>
Core Strategy Preferred Approach ⁷ (February 2010)	<p>West Witney strategic development area identified for around 1,000 homes and at least 10 ha of business land.</p> <p>Land off Swinbrook Road, Carterton identified as a strategic development area for around 200 homes.</p> <p>Redevelopment of MOD land, Carterton (REEMA North and Central) identified as a priority.</p> <p>Land east of Chipping Norton identified as a strategic development area for around 200 homes.</p> <p>Potential strategic options identified to the east of Carterton, west of Carterton and to the north of Witney.</p> <p>Also included some discussion of alternative options to the north-east, east and south of Witney and to the north of Carterton but no other allocations proposed.</p>

⁵ <http://www.westoxon.gov.uk/media/82128/Site-allocation-further-site-consultation.pdf>

⁶ <http://planningconsultation.westoxon.gov.uk/consult.ti/CSInterimFeb09/consultationHome>

⁷ <http://planningconsultation.westoxon.gov.uk/consult.ti/CSPreferredApproach/consultationHome>

Consultation Document/Stage	Approach taken towards site allocations
Draft Core Strategy ⁸ (January 2011)	<p>West Witney strategic development area identified for around 1,000 homes and at least 10 ha of business land.</p> <p>Redevelopment of MOD land, Carterton (REEMA North and Central) identified as a priority.</p> <p>Potential strategic options identified to the east and west of Carterton.</p> <p>Land to the north at Kilkenny Farm ruled out.</p> <p>No strategic site identified at Chipping Norton.</p>
Draft Local Plan ⁹ (October 2012)	<p>West Witney strategic development area identified for around 1,000 homes and at least 10 ha of business land.</p> <p>East Witney strategic development area identified for around 300 homes.</p> <p>MOD land, Carterton (REEMA North and Central) identified a strategic development area of around 400 homes.</p> <p>Land east of Carterton identified as a strategic development area of around 700 homes.</p> <p>Content discussing alternative options at Witney, Carterton and Chipping Norton but no other allocations proposed.</p> <p>Brief discussion of other potential options at Eynsham, Long Hanborough, Woodstock, Burford, Charlbury, the Wychwoods and Stonesfield.</p>
Local Plan Housing Consultation Paper ¹⁰ (July 2014)	<p>West Witney strategic development area identified as a commitment (resolution to grant subject to S106) for around</p>

⁸ http://planningconsultation.westoxon.gov.uk/consult.ti/Draft_Core_Strategy_January_2011/consultationHome

⁹ http://planningconsultation.westoxon.gov.uk/consult.ti/Draft_Local_Plan_2012

¹⁰ http://planningconsultation.westoxon.gov.uk/consult.ti/Housing_Consultation/consultationHome

Consultation Document/Stage	Approach taken towards site allocations
	<p>1,000 homes and at least 10 ha of business land.</p> <p>East Witney strategic development area identified for around 400 homes.</p> <p>North Witney strategic development area identified for around 1,000 homes.</p> <p>Content discussing of alternative strategic options to the south and north east of Witney but no other allocations proposed.</p> <p>Land east of Carterton identified as a strategic development area of around 700 homes.</p> <p>MOD land, Carterton (REEMA North and Central) identified a strategic development area of around 200 homes (net gain).</p> <p>Some discussion of alternative strategic options to the north and west of Carterton but no other allocations proposed.</p> <p>East Chipping Norton strategic development area identified for around 500 homes.</p>
<p>Pre-Submission Draft Local Plan (March 2015)</p>	<p>West Witney strategic development area identified as a commitment (resolution to grant subject to S106) for around 1,000 homes and at least 10 ha of business land.</p> <p>East Witney strategic development area identified for around 400 homes.</p> <p>North Witney strategic development area identified for around 1,000 homes.</p> <p>Content discussing alternative strategic options to the south and north east of Witney but no other allocations proposed.</p> <p>Land east of Carterton identified as a commitment (resolution to grant subject to S106) for around 700 homes.</p> <p>MOD land, Carterton (REEMA North and Central) identified as a strategic development area of around 200 homes (net gain).</p> <p>East Chipping Norton strategic development area identified for around 600 homes.</p>

Consultation Document/Stage	Approach taken towards site allocations
<p>Submission Draft Local Plan including Proposed Modifications I I (November 2016)</p>	<p>West Witney strategic development area identified as a commitment (resolution to grant subject to S106) for around 1,000 homes and at least 10 ha of business land.</p> <p>East Witney strategic development area identified for around 450 homes.</p> <p>North Witney strategic development area identified for around 1,400 homes.</p> <p>Land west of Down's Road Witney identified as an 'area of long-term development potential' (housing and employment)</p> <p>Content discussing f alternative options to the north east and south of Witney but no other allocations proposed.</p> <p>Land east of Carterton identified as a commitment (resolution to grant subject to S106) for around 700 homes.</p> <p>Additional content discussing alternative options to the north, north-east and west of Carterton, which were re-assessed through the SA, but no other allocations proposed.</p> <p>East Chipping Norton strategic development area identified for around 1,400 homes.</p> <p>West Eynsham strategic development area identified for around 1,000 homes.</p> <p>West Oxfordshire Garden Village strategic development area identified for around 2,200 homes.</p> <p>Content discussing alternative strategic options including land east of Woodstock (in Cherwell District) and land at Barnards Gate but no other allocations proposed.</p> <p>15 non-strategic site allocations identified , including:</p>

¹¹ <http://www.westoxon.gov.uk/media/1572550/CD5-Local-Plan-including-Proposed-Modifications.pdf>

Consultation Document/Stage	Approach taken towards site allocations
	<ul style="list-style-type: none"> • REEMA North and Central, Carterton (300 homes) • Milestone Road, Carterton (200 homes) • Land at Swinbrook Road, Carterton (70 homes) • Land north of Jefferson's Piece, Charlbury (40 homes) • Land east of Woodstock (300 homes) • Land north of Hill Rise, Woodstock (120 homes) • Land north of Banbury Road, Woodstock (250 homes) • Land north of Woodstock Road, Stonesfield (50 homes) • Land east of Burford (85 homes) • Land at Myrtle Farm, Long Hanborough (50 homes) • Oliver's Garage, Long Hanborough (25 homes) • Former Airfield, Stanton Harcourt (50 homes) • Land south of Milton Road, Shipton under Wychwood (44 homes) • Land west of Minster Lovell (85 homes) • Woodford Way Car Park, Witney (50 homes)

- 3.6 It is evident that the Council's position towards the allocation of housing sites has evolved due to the length of time taken to prepare the Local Plan (previously Core Strategy) and changing national policy during that period including the shift towards the preparation of a single Local Plan rather than multiple documents.
- 3.7 Up until the pre-submission draft Local Plan was formally published in March 2015, the primary focus had been on the allocation of larger strategic development areas (SDAs).
- 3.8 Following the Local Plan examination hearing sessions in November 2015 and the Inspector's preliminary findings of December 2015, the Council has taken the opportunity to strengthen the Local Plan and provide additional certainty and flexibility through the allocation of both strategic and non-strategic sites.
- 3.9 The Council considers that the site allocations set out in the proposed modifications of November 2016 represent a robust and well considered package of sites that provide a solid basis for ensuring delivery of West Oxfordshire's overall housing requirement plus the agreed apportionment for Oxford's unmet housing need.
- 3.10 Below we explain in more detail the process which the Council has followed to identify these sites.

4. SITE SELECTION PROCESS UP TO AND INCLUDING PUBLICATION (MARCH 2015)

- 4.1 The Council formally published its pre-submission draft Local Plan in March 2015. The submission draft plan included four Strategic Development Areas (SDAs):
- East Witney (400 homes)
 - North Witney (1,000 homes)
 - REEMA Central (200 homes)
 - East Chipping Norton (600 homes)
- 4.2 In this section we briefly explain the process which the Council followed in identifying these four strategic sites. This included a number of separate, but inter-related workstreams as summarised below.
- Strategic Housing Land Availability Assessment (SHLAA) 2014**
- 4.3 The potential suitability and deliverability/developability of these and other site options within the District was considered in detail through the Council's Strategic Housing Land Availability (SHLAA) published in 2014 (HOU6).

- 4.4 In line with national guidance the SHLAA assessed the availability, suitability, achievability and deliverability / developability of various sites for development, having regard to a number of relevant factors which had been identified in a previously published method statement.
- 4.5 This included consideration of site size/capacity, flood risk, accessibility including highways, public transport, walking and cycling, residential amenity, landscape, ecology and heritage considerations, infrastructure and physical constraints, availability and achievability (including viability).
- 4.6 The 2014 study adopted a site size threshold of 10 dwellings or more and was prepared in-house by a multi-disciplinary team of officers from the District Council with input from Oxfordshire County Council on highways issues, public transport and infrastructure capacity as appropriate.
- 4.7 The table below briefly summarises the conclusions reached in the 2014 SHLAA in relation to the four strategic development areas that were identified in the pre-submission draft Local Plan (March 2015).

TABLE 2 : SHLAA 2014 - Conclusions on Strategic Development Areas

Site	2014 SHLAA findings	Notes/comments
East Witney SDA	<p>Cogges Triangle - sustainable location, part of site relatively well screened from wider area thereby serving to mitigate landscape and visual impact of development. Potential scope for up to 370 dwellings subject to developer demonstrating that this can be achieved without harm.</p> <p>Land off Stanton Harcourt Road - Significant development would be an intrusion into the valley landscape. The site is also affected by flood risk. There may be scope for very limited development (30 dwellings) in line with and serving to round off the existing built area.</p>	<p>SDA falls into two parts - land at Cogges Triangle and land off the Stanton Harcourt Road.</p> <p>Cumulative capacity of 400 dwellings identified.</p>

Site	2014 SHLAA findings	Notes/comments
North Witney SDA	Relatively sustainable location for urban extension development although not proximate to Witney's main employment areas. If the site were to come forward would need to deliver significant highway infrastructure including the West End Link and Northern Relief Road. However, landscape sensitivities reduce the capacity of development (1,000 homes)	
REEMA Central SDA	Suitable, available and developable for 200 units. There are no insurmountable constraints to development and the landowners are actively pursuing development. However, final confirmation and release of the site for private market housing by the DIO is not expected until construction at REEMA North is complete (expected 2016).	200 units represented the anticipated net gain over and above the number of existing residential units on the site.
East Chipping Norton SDA	Sustainable location close to town centre and services. Located outside the AONB. Landscape assessment suggests that up to 500 homes could be provided. Access issues would however need to be overcome for development to come forward and primary school capacity is a further consideration.	The assessment related only to land south of London Road.

4.8 Importantly, a number of alternative strategic site options were considered through the same process and using the same methodology. The conclusions reached in relation to those alternative sites are briefly summarised in the table below.

TABLE 3 : SHLAA 2014 – Conclusions on alternative strategic development sites

Site	2014 SHLAA findings	Notes/comments
West Witney (North Curbridge)	N/a	The site was not assessed in terms of suitability as resolution to grant outline planning permission had already been secured. Assumed capacity of 1,000 homes.
South Witney	Not suitable - development of this site would result in unsustainable urban sprawl, dependent on car travel, subject to a poor level of residential amenity and causing the coalescence of Witney with outlying villages.	
North East Witney	Not suitable - the development of this site would be urban sprawl into open countryside which would have a significant adverse impact on the setting of the town, especially upon views from the west and north. Jubilee Way (the North East Distributor Road) presents a barrier to the integration of the site with the town.	A larger north east Witney site has since been submitted for consideration.
East Carterton	Suitable subject to the incorporation of a substantive landscape transition zone to the north and east to limit the visual and landscape impact on the setting of Brize Norton village the site is considered suitable for development with no absolute constraints to development or delivery. Acceptable noise and flood mitigation will be required through the design of the development.	Resolution to grant outline planning permission secured since (700 dwellings).

Site	2014 SHLAA findings	Notes/comments
West Carterton	Not suitable - development would be a major incursion into open countryside of high landscape sensitivity and intervisibility and would appear as an alien intrusion into the open wolds and wider landscape. Access to the site would require built structures being provided across the Shill Brook an ecologically sensitive area which also physically separates the site from the town. The site is not well related to the built up area.	Outline planning permission subsequently refused (1,000 dwellings).
North Carterton (Kilkenny Farm)	Not suitable - Development as proposed would be a major intrusion into the open countryside but constraining the development to the south east area of the site would limit the landscape impact. Development would however be an isolated, satellite village, not well related to the town, existing services and facilities. The site has relatively poor walking, cycling and public transport access and a need for widening along Burford Road which would be required change the character of the road. OCC Highways recommend the site not be taken forward.	

4.9 The Council considers the 2014 SHLAA to be a robust document that adopts an objective and evidence based approach towards the assessment of various site options across the District including both strategic and non-strategic sites.

Assessment of Strategic Site Options

- 4.10 In addition to the 2014 SHLAA, the Council prepared a more detailed assessment of strategic site options to help inform the pre-submission draft Local Plan. The focus of this work was on strategic site options at Witney, Carterton and Chipping Norton in line with the proposed spatial strategy which focuses on these three main towns.
- 4.11 There have been several iterations of the Council's assessment of strategic site options including October 2012 (OTH3) June 2014 (OTH2) and February 2015 (OTH1). The table below briefly summarises the strategic sites considered in each report.

TABLE 4 : Assessment of Strategic Site Options 2012 -2015

Report	Strategic Site Options Considered
Assessment of Strategic Site Options (October 2012)	<ul style="list-style-type: none"> East Carterton North Carterton (Kilkenny Farm) North Carterton (David Wilson Homes) West Carterton North Witney West Witney East Witney
Assessment of Strategic Site Options (June 2014)	<ul style="list-style-type: none"> East Carterton North Carterton (Kilkenny Farm) West Carterton REEMA Central North Witney East Witney East Chipping Norton
Assessment of Strategic Site Options (February 2015)	<ul style="list-style-type: none"> North Carterton (Kilkenny Farm) West Carterton

Report	Strategic Site Options Considered
	REEMA Central, Carterton North Witney East Witney South Witney North East Witney East Chipping Norton

4.12 Within the reports, each strategic option has been assessed against a number of criteria and questions under the following six headings:

- Accessibility and transport
- Natural and historic environment
- Landscape impact and settlement integration
- Sustainable communities
- Deliverability and viability
- Efficiency and flexibility

4.13 Thus for example under accessibility and transport, the reports include an assessment of site access, relationship to existing services and facilities in particular by walking, cycling and public transport and traffic impact both in terms of existing settlements and the rural road network. Whilst under natural and historic environment an assessment is made in relation to flood risk, biodiversity and ecology, noise pollution, contamination and land stability, mineral resource sterilisation, agricultural land value, water quality and potential impact on heritage assets.

4.14 The strategic sites assessment reports each draw on relevant technical evidence and sources of secondary data and this is clearly referenced to signpost the reader. The reports include an overall summary of how each site option ‘performs’ against the relevant criteria but make no specific recommendations.

4.15 The reports present an objective and balanced assessment of the relevant ‘pros’ and ‘cons’ of each site which was taken into account in determining which strategic sites to allocate in the pre-submission draft Local Plan (March 2015). It was not necessary to prepare an updated Strategic Site Options Paper in 2016 because the new SHELAA and SA Addendum provided a comprehensive framework for assessing both strategic and non-strategic options in light of the increased housing target.

Sustainability Appraisal (SA)

4.16 A further key influence on the site selection process has been the process of Sustainability Appraisal (SA). The Pre-Submission Draft Sustainability Appraisal Report (February 2015) assessed various directions for growth at Witney, Carterton and Chipping Norton as follows:

Witney

- South Witney
- East Witney
- North East Witney
- North Witney
- Multi-site option

Carterton

- East Carterton
- REEMA North and Central
- North Carterton (Kilkenny Farm)
- West Carterton
- Multi-site option

Chipping Norton

- East Chipping Norton

4.17 The SA report assessed each strategic option against an agreed framework of SA objectives and decision aiding questions. The findings of the SA report were duly taken into account by the Council along with other relevant evidence in determining which strategic sites to allocate in the pre-submission draft Local Plan (March 2015). The SA and other evidence showed that the Strategic Development Areas at East Witney, North Witney, REEMA Central, and East Chipping Norton were suitable and deliverable, and consistent with the overall strategy of the plan. The Council accepted these conclusions through its decision to approve the Draft Local Plan for submission in February 2015.

4.18 Notably, following the Local Plan Stage I examination hearing sessions held in November 2015 the Inspector in his preliminary findings concluded that the SA report was 'adequate in its general scope and approach'.

Habitat Regulations Assessment (HRA)

4.19 In accordance with legislative requirements the Council commissioned a Habitats Regulations Assessment (HRA) of the pre-submission draft Local Plan (March 2015). The objective of the report (SD9) was to identify any aspects of the Final Version Pre-Submission Draft Local Plan that would have the potential to cause a likely significant effect on Natura 2000 or European sites

(Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), either in isolation or in combination with other plans and projects, and to devise appropriate mitigation strategies where such effects are identified.

- 4.20 As part of the HRA report the policies of the pre-submission draft Local Plan (including those relating to the four proposed Strategic Development Areas) were screened for their potential impact.
- 4.21 Whilst the HRA report did not directly influence the strategic site selection process leading up to publication of the pre-submission draft Local Plan in March 2015 it nonetheless provides important evidence as to the likely effects of those site allocations together with other proposed policies within the Local Plan.
- 4.22 Importantly the HRA report concluded that ‘there is no prospect of a likely significant effect of the West Oxfordshire Local Plan on any European sites through any impact pathways except potentially air quality on the Oxford Meadows SAC’. As such it recommended a number of plan level measures be adopted to enable a conclusion of no adverse effect to be reached.
- 4.23 These sites were subsequently taken forward in the proposed modifications published in November 2016 in accordance with the recommendations of the Local Plan Inspector in Part I of his preliminary findings published in December 2015.

Other Supporting Technical Evidence

- 4.24 The selection of the four strategic development areas by the Council in February 2015 also took account of other relevant evidence prepared by or commissioned by the Council. This included the following:
- Infrastructure Delivery Plan – emerging findings in February 2015 and finalised in July 2015 (SD8)
 - Local Plan and CIL Update Viability Study – February 2015 (VIAB1)
 - West Oxfordshire Economic Snapshot and Outlook – January 2015 (ECON1)
 - Technical Note: Witney Development and Infrastructure Strategic Modelling - October 2014 (TRA1)
 - West Oxfordshire Draft Local Plan Modelling Technical Note – June 2014 (TRA1a)
 - West Oxfordshire Draft Local Plan Modelling Technical Note Additional Tests – June 2014 (TRA1b)
 - Technical Note 1: Summary of Development and Infrastructure Strategic Modelling – October 2012 (TRA2)
 - Landscape and Visual Review of Two Additional Submissions for Witney Strategic Development Options - January 2015 (LAN1)
 - Landscape and Visual Review of Chipping Norton Strategic Site Option - May 2014 (LAN2)

- Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options - October 2012 (LAN3)
- Carterton Landscape Assessment - June 2009 (LAN4)
- Chipping Norton Landscape Assessment - June 2009 (LAN5)
- Witney Landscape Assessment - November 2007 (LAN6)
- West Oxfordshire Landscape Assessment – 1998 (LAN7)
- Land North of Witney and West End Link preliminary ecological appraisal - January 2015 (ENV2)
- West Oxfordshire Level 1 Strategic Flood Risk Assessment SFRA – 2009 (ENV3)
- Witney Level 2 Strategic Flood Risk Assessment – emerging findings in February 2015 and finalised in March 2015 (ENV4)
- West Oxfordshire Local Development Framework Settlement Sustainability Report – December 2013

4.25 In informing the Council’s decision in February 2015 regard was also given to the information and technical evidence provided by the promoters of various strategic site options through the Local Plan process, but this did not change the Council’s overall conclusions on the suitability of the strategic development area options.

Stakeholder and Member Engagement

4.26 The site selection process which culminated in the Council’s decision in February 2015 took full account of public stakeholder engagement and engagement with District Councillors. This helped identify opportunities and issues of concern which were then addressed in the Draft Local Plan, in the SA and in other background evidence.

4.27 In terms of public stakeholder engagement, as outlined earlier in Section 3, extensive consultation took place up until submission of the draft Local Plan in July 2015. This included:

- Core Strategy ‘Issues and Options’ (March 2008)
- Site Allocations ‘Issues and Options’ (March 2008)
- Site Allocations: Issues & Options Further sites consultation (July 2008)
- Core Strategy So Far: Interim Position Statement (February 2009)
- Core Strategy Preferred Approach (February 2010)
- Draft Core Strategy (January 2011)
- Draft Local Plan (October 2012)
- Local Plan Housing Consultation Paper (July 2014)

4.28 With the exception of the Core Strategy Issues and Options consultation in March 2008, views were sought on specific sites during each of these periods of public consultation and the responses received were taken into account in preparing the pre-submission draft Local Plan (March 2015). This is set out in more detail in the Council’s Regulation 22 (c) Consultation Statement – July 2015 (CD3).

- 4.29 Notably when the pre-submission draft Local Plan was published in March 2015 there were only around 150 respondents and relatively few objections made in relation to the four allocated strategic sites.
- 4.30 With regard to member engagement, preparation of the Local Plan has been accompanied by a series of ongoing member workshops which have included a range of different topics including the potential allocation of sites within the Local Plan.
- 4.31 A number of workshops were held during 2014 leading up to Cabinet and Council meetings in February 2015 when Councillors agreed the formal publication of the pre-submission draft Local Plan in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Summary

- 4.32 The pre-submission draft Local Plan approved by the Council in February 2015 and published in March 2015 included four strategic development areas as follows:
- East Witney (400 homes)
 - North Witney (1,000 homes)
 - REEMA Central (200 homes)
 - East Chipping Norton (600 homes)
- 4.33 As has been set out above these sites were selected by the Council through its decision in February 2015 having regard to a range of relevant considerations and technical evidence including:
- SHLAA 2014
 - Assessment of Strategic Site Options (2012, 2014, 2015)
 - Sustainability Appraisal
 - Habitat Regulations Assessment
 - Various technical evidence (including infrastructure, viability, the economy, transport, landscape, ecology, flood risk and settlement sustainability)
 - Stakeholder and member engagement
- 4.34 The Council is confident that the process undertaken was robust and that the most appropriate sites were identified with due consideration given to all reasonable alternatives.

5. SITE SELECTION PROCESS – POST STAGE I HEARINGS (NOVEMBER 2015)

- 5.1 Following submission of the pre-submission draft Local Plan in July 2015, the Stage I examination hearing sessions took place in November 2015. The Inspector’s preliminary findings were published in December 2015 and raised a number of specific concerns, in particular the overall housing requirement, failure to take account of unmet housing need from Oxford City and the need to provide additional certainty and flexibility through the allocation of additional sites to support the delivery of an ongoing 5-year housing land supply.
- 5.2 In light of these preliminary findings the examination was suspended in January 2016 to enable the Council to undertake further work.
- 5.3 From the outset of the suspension the Council sought to understand and address the following :
- The extent to which the four existing strategic development areas at Witney, Carterton and Chipping Norton could reasonably be increased in size/capacity and the potential benefits and dis-benefits associated with any proposed increase;
 - The availability, suitability and deliverability / developability of other potential strategic development areas within the District and the potential benefits and dis-benefits associated with each;
 - The availability, suitability and deliverability / developability of smaller, non-strategic housing sites within the District and the potential benefits and dis-benefits associated with each;
 - The extent to which ‘exceptional circumstances’ might exist to justify potential ‘major’ development within the Cotswolds Area of Outstanding Natural Beauty (AONB);
 - The most appropriate and sustainable way of assisting Oxford with its ‘unmet’ housing need including the spatial relationship of any options to Oxford itself;
 - How any significant increase in the overall housing requirement (including a proportion of Oxford’s unmet need) could be most appropriately accommodated in accordance with the overall spatial strategy of the Local Plan as submitted for examination; and
 - The likely housing trajectory for the District in the period to 2031 in light of any significant increase in the housing requirement and how this could most appropriately be balanced across the plan period through a combination of larger strategic sites (boosting mid to longer-term supply) and smaller non-strategic allocations (boosting short-term supply).

- 5.4 The Local Plan proposed modifications were published in November 2016. They include 20 housing site allocations.
- 5.5 There are five Strategic Development Areas (SDAs) including:
- Land to the east of Witney (450 homes)
 - Land to the north of Witney (1,400 homes)
 - Land to the east of Chipping Norton at Tank Farm (1,400 homes)
 - Land west of Eynsham (1,000 homes)
 - West Oxfordshire Garden Village (2,200 homes)
- 5.6 There are 15 'non-strategic' housing allocations including:
- REEMA North and Central, Carterton (300 homes)
 - Milestone Road, Carterton (200 homes)
 - Land at Swinbrook Road, Carterton (70 homes)
 - Land north of Jefferson's Piece, Charlbury (40 homes)
 - Land east of Woodstock (300 homes)
 - Land north of Hill Rise, Woodstock (120 homes)
 - Land north of Banbury Road, Woodstock (250 homes)
 - Land north of Woodstock Road, Stonesfield (50 homes)
 - Land east of Burford (85 homes)
 - Land at Myrtle Farm, Long Hanborough (50 homes)
 - Oliver's Garage, Long Hanborough (25 homes)
 - Former Airfield, Stanton Harcourt (50 homes)
 - Land south of Milton Road, Shipton under Wychwood (44 homes)
 - Land west of Minster Lovell (85 homes)
 - Woodford Way Car Park, Witney (50 homes)
- 5.7 In this section we explain the process which the Council followed in identifying these 20 housing site allocations. This included a number of separate, but inter-related work streams as summarised below.

Strategic Housing and Economic Land Availability Assessment (SHELAA) 2016

- 5.8 Following suspension of the Local Plan examination in January 2016 the Council undertook a 'call for sites' exercise between January and February 2016 inviting landowners, developers and other stakeholders to put forward potential sites for housing and employment development. A large number of new sites were put forward in response to the call for sites exercise.
- 5.9 The SHELAA (2016) adopted a similar approach to the SHLAA (2014) although adopted a lower site size threshold of 5 dwellings (previously 10 dwellings) to ensure a more exhaustive search for

potential development sites. It also included an assessment of economic land potential not just residential land potential.

- 5.10 All existing sites set out the SHLAA (2014) were re-assessed through the SHELAA (2016) for their suitability in terms of both housing and employment. This was a particularly important part of the process and consistent with the Government's practice guidance which suggests that following completion of a land availability assessment, if insufficient sites have been found, the assessment should be revisited.
- 5.11 Notably the re-assessment of existing SHLAA (2014) sites through the SHELAA (2016) included detailed consideration of the extent to which the four allocated Strategic Development Areas (SDAs) identified in the pre-submission draft Local Plan could potentially be increased both in terms of site area and the likely extent of any developable area.
- 5.12 In addition, all new sites submitted through the call for sites exercise or identified by the Council were subject to a full assessment using the SHELAA framework.
- 5.13 The assessment included consideration of site size/capacity, flood risk, accessibility including highways, public transport, walking and cycling, residential amenity, landscape, ecology and heritage considerations, infrastructure and physical constraints, availability and achievability (including viability).
- 5.14 The SHELAA (2016) was prepared in-house by a multi-disciplinary team of Officers from the District Council with input from Oxfordshire County Council on highways issues, public transport and infrastructure capacity as appropriate. There was a fresh site assessment of all of the sites, and input from Parish Councils was considered. The methodology of the SHELAA regarding site capacity was developed from that used in the 2014 SHLAA. For example In the SHLAA a general assumption of 30 dwellings per hectare was made. The SHELAA re-assessed density, looking at 35 dwelling per hectare as a general approach, augmented by site specific assumptions where appropriate informed by context and further work undertaken by landowners/developers. The boundaries of sites and the extent of developable area were also reviewed.
- 5.15 The table below summarises the SHELAA (2016) findings in relation to the 5 strategic development allocations and 15 non -strategic allocations. More detail on the assessment of the 4 non-strategic allocations in the Cotswolds AONB is set out in Section 7 below.

TABLE 5: SHEELA 2016 Summary Conclusions for Strategic Development Allocations and Non-Strategic Allocations

Site	SHELAA (2016) Summary Conclusions	Comments/Notes
Strategic Allocations		
Land to the east of Witney	<p>Cogges Triangle – suitable. Sustainable location, part of site relatively well screened from wider area thereby serving to mitigate landscape and visual impact of development.</p> <p>Potential scope for up to 420 dwellings subject to developer demonstrating that this can be achieved without harm.</p> <p>Land off Stanton Harcourt Road – suitable. Significant development would be an intrusion into the valley landscape. The site is also affected by flood risk. There is however scope for very limited development in line with and serving to round off the existing built area (30 dwellings).</p>	
Land to the north of Witney	<p>Suitable - Sustainable location for urban extension. Offers the potential to deliver significant highway infrastructure including the West End Link and Northern Relief Road as well as other new infrastructure including new primary school and open space.</p> <p>Surface water run-off and flood risk are key considerations for the site as are landscape and visual impact and traffic impact.</p> <p>The extent of any developable area would need to avoid any potential coalescence with settlements to the north.</p>	<p>Estimated capacity of 1,300 combined with site west of Hailey Road (considered suitable for 100 dwellings) to create overall estimated capacity of 1,400 dwellings.</p> <p>Increase over the original 1,000 dwellings identified in the 2014 SHLAA.</p>
Land to the east of Chipping Norton at Tank Farm	Several parcels assessed. Considered to be suitable as part of a wider comprehensive scheme.	Several individual parcels of land assessed in this location. Cumulative capacity of around 1,400 homes.

Site	SHELAA (2016) Summary Conclusions	Comments/Notes
Land west of Eynsham	Suitable as part of comprehensive scheme - Has the potential to form part of a wider strategic urban extension to the west of Eynsham subject to wider masterplanning. Sustainable location with the opportunity to deliver strategic infrastructure improvements.	Several individual parcels of land assessed in this location.
West Oxfordshire Garden Village	Suitable as part of comprehensive scheme - Large site which is divorced from Eynsham by the A40 but lies in close proximity to Hanborough Station and the premium bus route. The merits of land north of the A40 have been considered as part of the countywide work on apportioning unmet housing need from Oxford City and it has been assessed favourably. Potential large-scale new village of around 2,200 homes.	Several individual parcels of land assessed in this location.
Non-strategic allocations		
REEMA North and Central, Carterton	Suitable - The principle of residential development in this location is acceptable. Permission has been granted for development of part of the site. The remainder is likely to be available and developed within the plan period.	Assessment related only to REEMA Central as REEMA North had already secured planning permission.
Milestone Road, Carterton	Suitable - Development in this location would relate well to existing housing and would not extend the built extents of the town into the open countryside. The proximity of the site to the airbase and runway should be a key consideration for the development of the site.	Previous residential permissions on the site.
Land at Swinbrook Road, Carterton	Part of the site is considered suitable for development, particularly that to the south and east where it would relate better to existing development.	Previous resolution to grant outline planning permission for 66 homes (now disposed of)
Land north of Jefferson's Piece, Charlbury	See detail in section 7	See detail in section 7

Site	SHELAA (2016) Summary Conclusions	Comments/Notes
Land east of Woodstock	Suitable - Sustainable location for residential development within the urban area and on a previously developed site. Not currently available for development but reasonable to expect it to come forward in the longer term.	Resolution to grant outline planning permission has since been secured.
Land north of Hill Rise, Woodstock	<p>Suitable - Whilst the site falls within a generally sensitive landscape area this site is not considered to be particularly sensitive and whilst there will inevitably be a landscape impact it is not considered to present an insurmountable constraint to development provided any scheme in this location is designed well with appropriate mitigation.</p> <p>There is an existing public right of way running through the site which would need to be incorporated into any scheme. A small element of compatible employment uses could also potentially be provided. Development would also provide the opportunity to improve / reprovide the existing play area in the south of the site which is of poor quality.</p> <p>If developed sensitively, there is the potential to deliver new housing in a sustainable location.</p>	
Land north of Banbury Road, Woodstock	<p>Suitable - There are constraints associated with this site, including access and local landscape impact, but if developed sensitively, there is the potential to deliver new housing in a sustainable location.</p> <p>Potential to form part of a wider comprehensive scheme including adjoining sites in order to address access constraints.</p>	Three separate parcels of land assessed.
Land north of Woodstock Road, Stonesfield	See detail in section 7	See detail in section 7
Land east of Burford	See detail in section 7	See detail in section 7

Site	SHELAA (2016) Summary Conclusions	Comments/Notes
Land at Myrtle Farm, Long Hanborough	<p>Suitable - Provided the development is designed to retain the countryside view to the north and to protect and enhance the landscape belt to the north, this is a suitable site for development in a central location within the village.</p> <p>In recent years the character of this site and the surrounding area has changed (from when it was assessed at the previous Local Plan Inquiry). Housing development has taken place immediately to the west, a supermarket has been constructed to the east, the landscape belt to the north has matured to provide a soft screen and the former gravel pit to the west has been removed.</p>	
Oliver's Garage, Long Hanborough	<p>Suitable - The site is a suitable location for residential development and comprises previously developed land. It is currently in use and thus not immediately available but it is reasonable to assume it could become available in the medium term.</p>	Current planning application.
Former Airfield, Stanton Harcourt	<p>Suitable - As a partly brownfield site within and on the edge of the village, development on at least part of this site has been given serious consideration. This is a sensitive site, with numerous environmental assets on or nearby, but provided these features are appropriately protected and enhanced, there are no over-riding physical or policy constraints; some limited form of development could be accommodated on this site.</p>	Resolution to grant outline planning permission has since been secured.
Land south of Milton Road, Shipton under Wychwood	See detail in section 7	See detail in section 7
Land west of Minster Lovell	<p>Suitable - The site is considered to represent a sustainable location for new residential development. It is within comfortable walking distance of local services and facilities in Minster Lovell and is within walking and cycling distance of the main employment area to the west of Witney.</p>	Resolution to grant outline planning permission has since been secured.

Site	SHELAA (2016) Summary Conclusions	Comments/Notes
Woodford Way Car Park, Witney	Suitable - Sustainable location for residential development within the urban area and on a previously developed site. Not currently available for development but reasonable to expect it to come forward in the longer term.	

5.16 The SHELAA (2016) also concluded that a number of other sites had some potential suitability for housing but these were not included as proposed allocations through the Local Plan proposed modifications.

5.17 The table below lists these sites, the summary conclusions from the SHELAA and the Council's reason for not formally allocating the site within the Local Plan proposed modifications, which were approved by Council in October 2016. More detail on the assessment of sites within the Cotswolds AONB is set out in Section 7 below.

TABLE 6: SHEELA 2016 Summary Conclusions regarding Non Allocated Sites

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
MAIN SERVICE CENTRES			
19	Nurseries off Alvescot Road, Carterton	<p>Deliverable</p> <p>The site has an extant planning permission and is included on the Council's brownfield register. The principle of development in this location is acceptable.</p>	<p>Site considered to be too small for formal allocation.</p> <p>Extant planning permission in place for site and already counted in Council's housing land supply calculations.</p>
23	Land at 23 Brize Norton Road, Carterton	<p>Developable</p> <p>Site may be available in the medium term when activities at the breeding aviary have ceased.</p>	<p>Site considered suitable for small scale development but is not currently available for development.</p> <p>No evidence that this site is deliverable within the plan period.</p> <p>Suitability of development could be considered against criteria based policies of the Local Plan</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
239	Linden House, Kilkenny Lane, Carterton	<p>Developable</p> <p>The principle of development has already been accepted on the southern part of the site</p> <p>Restricting development to the southern part of the site will help to mitigate the landscape impact of development in this location.</p>	<p>Permission for 10 dwellings granted on southern part of site 14/1339/P/OP.</p> <p>As principle has been accepted, site is considered appropriate but not necessary to allocate.</p> <p>Permitted dwellings counted in housing land supply calculations.</p>
422	Land west of Burford Road, Chipping Norton	See detail in section 7	See detail in section 7
424	Land between Walterbush Road and Burford Road, Chipping Norton	See detail in section 7	See detail in section 7
25	Bus Depot and Garage	<p>Not currently developable</p> <p>Planning approval for 6 dwellings and other business uses on part of site. Site currently in use. Further development suitable in principle but would require relocation of bus depot therefore longer term opportunity. Would also require detailed consideration of potential flood risk issues.</p>	<p>Although location would be suitable for residential re-development, the buildings are in active use and there is no certainty about future availability.</p> <p>Not considered suitable for an allocation in the Local Plan due to questionable deliverability.</p>
28	Scrap Yard, West End	<p>Not currently developable</p> <p>In existing employment use - not currently available for re-development. Potentially suitable subject to a number of site constraints, including whether suitable vehicular access can be achieved.</p>	<p>Although location would be suitable for residential re-development, the land is in active use and there is no certainty about future availability.</p> <p>Access to the site is another key constraint.</p> <p>Not considered suitable for an allocation in the Local Plan due to questionable deliverability.</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
31	Welch Way, Broad Area - civic buildings, Witney	<p>Not currently developable</p> <p>In existing community uses which are appropriate for this accessible location. Housing and /or additional employment uses (e.g. offices) may come forward as part of redevelopment for a mixed use scheme.</p> <p>Subject to flood risk. a suitable location in principle and comprises previously developed land.</p>	<p>Although location would be suitable for residential re-development, the civic buildings are in active use and there is no prospect of them being made available in the medium term.</p> <p>Not considered suitable for an allocation in the Local Plan due to questionable deliverability.</p>
32	Welch Way, Broad Area - BT depot/offices and Joinery	<p>Not currently developable</p> <p>In existing use. Housing may come forward as part of redevelopment for a mixed use scheme. Subject to flood risk. a suitable location in principle and comprises previously developed land.</p>	<p>Although location would be suitable for residential re-development, the buildings are in active use and there is no certainty about their future availability.</p> <p>Not considered suitable for an allocation in the Local Plan due to questionable deliverability.</p>
197	Thames Water Depot, Dark Lane	<p>Developable</p> <p>Previously developed site in sustainable location. Surplus to requirements. Redevelopment would need to address flood risk issues to come forward.</p> <p>Part of the site has planning permission. There may be scope for further limited possibly flatted development on the western portion.</p>	<p>Part of site has been redeveloped for housing and dwellings counted in Council's housing land supply calculations.</p> <p>Remainder of site is in active use as part of Sewerage infrastructure and is not available for development.</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
202	Woolgate Centre and Car Park	<p>Not currently developable</p> <p>Site owners are suggesting mixed uses through intensifying development on the site. The car park is heavily used and is sub-divided by groups of mature trees which are an important part of the character of this part of the town. While residential development could form one of the future uses on this site, as part of a mixed use development with retail and additional car parking achieving an acceptable scheme is likely to be complex and thus unlikely to come forward in the short to medium term.</p>	<p>Although location would be suitable for residential re-development, the buildings and car parks are in active use and are not available for development</p> <p>Not considered suitable for an allocation in the Local Plan due to questionable deliverability.</p>
307 (overlaps with Site 338)	Bathing House Farm, Springfield Oval, Witney	<p>Deliverable</p> <p>This, and the adjoining site, provide a green buffer between the built-up area of the town and development in isolation could have a harmful effect on the landscape.</p> <p>However the context of the site has changed with the recent appeal decision to allow 260 new homes on land immediately to the west.</p> <p>In light of that decision this site in conjunction with land to the south (site 338) is potentially suitable for limited residential development of around 50 - 60 homes.</p>	<p>Access to this site is a key constraint to development.</p> <p>Not allocated as suitability for development better considered through a planning application.</p> <p>It is apparent that different options could be pursued in terms of access</p> <p>Permission granted for residential development.</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
338	Land north of Springfield Oval, Witney	<p>Deliverable</p> <p>The site immediately adjoins the built-up area of Witney but the site projects into the Windrush valley and development in isolation could have a harmful effect on the landscape.</p> <p>However the context of the site has changed with the recent appeal decision to allow 260 new homes on land immediately to the west.</p> <p>In light of that decision this site is considered to be potentially suitable for limited residential development of around 50 - 60 homes.</p>	<p>Access to this site is a key constraint to development.</p> <p>Not allocated as suitability for development better considered through a planning application.</p> <p>It is apparent that different options could be pursued in terms of access.</p> <p>Permission granted for 73 dwellings (16/00602/FUL) and counted in Council's housing land supply calculations.</p>
RURAL SERVICE CENTRES			
331	Backhouse Farm, Bampton	<p>Developable</p> <p>The site adjoins development on two sides, has the potential for good vehicular access and acceptable access by sustainable means and could be assimilated into the landscape with strong boundary planting. The scale of development with committed development could put a strain on local infrastructure necessitating later phasing.</p> <p>Site is suitable for development subject to sufficient investment in community infrastructure. Concern remains about over development of Bampton with limited opportunities for local employment. Most working age residents are likely to commute to locations out of the settlement to work.</p>	<p>Concern about cumulative impact of development on local services and facilities.</p> <p>Limited capacity within local community infrastructure to expand to accommodate further modest growth in Bampton.</p> <p>Permission granted for residential development of 160 dwellings (16/03415/OUT)</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
439	Land at Station Road, Bampton	<p>Deliverable</p> <p>Small scale development could be delivered on the site without significant detrimental impacts to the historic character of the settlement, if confined to the southern part of the site</p>	<p>Small scale site with limited capacity for housing .</p> <p>Ability of site to deliver additional infrastructure is limited while landscape and heritage mitigation would be best addressed through the planning application process</p> <p>Permission granted for residential development on part of site</p>
160	Land off Tanners Lane, Burford	See detail in section 7	See detail in section 7
161a	Land south of Sheep Street, Burford	See detail in section 7	See detail in section 7
461	Burford Cottage Hospital, Burford	See detail in section 7	See detail in section 7
369	Land North of Little Lees, Charlbury.	See detail in section 7	See detail in section 7
VILLAGES			
261	Westfield, Bampton Road, Aston	<p>Deliverable</p> <p>Conversion of building / reinstatement of residential use is considered appropriate but new development on surrounding land would have detrimental impact on the character of the area.</p>	<p>Only part of the site (Conversion of the existing building) considered appropriate for development. Remainder of site considered too sensitive and not appropriate for development or suitable as a housing allocation.</p>
377	Land at Churchill Farm, Kingham Road, Churchill	See detail in section 7	See detail in section 7

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
301	Land north of Mill Lane, Clanfield	<p>Developable</p> <p>Relatively unconstrained site the development of which would relate well to the existing built form of the village. Development would also present the opportunity to provide new and improved recreation facilities to the west. Key issues to address through any development of this site are access and school capacity.</p>	<p>Access to the site and the constrained nature of the Mill Lane junction are significant constraints to development of the site. At present no acceptable solution to this has been identified</p> <p>The site could be developed without significant harm to the landscape and historic setting of the settlement but the access constraints present questions over deliverability.</p>
142	Land at Curbridge	Developable subject to a comprehensive approach.	<p>Curbridge has very limited provision of services and facilities and no further enhancement of such infrastructure is planned. Although the site has been assessed as suitable against the SHELAA criteria, further housing allocations are not considered appropriate at this time, given the position of Curbridge in the settlement hierarchy.</p> <p>Significant, large scale development has been approved to the west of Witney, north of the A40 in accordance with a previous Local Plan allocation.</p>
237	Land at Well Lane	The site is in a sustainable location close to Witney and with excellent access to the premium S1 bus service allowing convenient travel to Carterton, Eynsham and Oxford.	
339b	Land south of Main Road	There is no question that development in this location would significantly alter the current linear form of the village. This was recognised in the Inspector's report of the previous Local Plan.	
339c	Land north of Bampton Road		
451	Land adjacent to Main Road	<p>However, landscape impact would be relatively localised and provided a comprehensive approach is taken and the number of homes is limited to a reasonable amount that would allow for a significant amount of open space to be incorporated into the development, the site offers the potential to create a high quality living environment in close proximity of Witney - the District's main town and without impinging on the existing gap between Witney and Curbridge.</p>	

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
190	Pear Tree Farm, Filkins	<p>Developable in part</p> <p>Applications for 10 dwellings on the site have previously been refused for various reasons including impact on the conservation area in this sensitive edge of village location. Limited low density redevelopment of existing modern farm buildings in a way which doesn't detract from this edge of village location and setting of Pear Tree Farm may be feasible but is likely to yield less than ten dwellings.</p>	<p>Sensitive site in relatively isolated rural location.</p> <p>Small scale site with potential to deliver limited development subject to conformity with criteria based policies of the Plan.</p> <p>Suitability of development better considered through planning application process.</p>
381	Freeland Nursery	<p>Developable in part</p> <p>This site is in active use, with buildings suitable for their current use.</p> <p>This is a sensitive site, both in terms of its landscape setting (particularly the trees within and nearby) and its historical estate features. It is likely that these issues will limit the amount of development that could be accommodated on this site.</p>	<p>Development potential of this site more appropriately explored through a planning application in accordance with criteria based policies.</p> <p>Buildings currently in active use and not considered suitable for an allocation</p>
383	Stable Buildings, Freeland	<p>Developable in part</p> <p>This is a sensitive site that is in active use for a variety uses, including a well-used veterinary surgery. There may be potential for very limited development, possibly as part of a wider scheme on Site 381</p>	<p>Development potential of this site more appropriately explored through a planning application in accordance with criteria based policies.</p> <p>Buildings currently in active use and not considered suitable for an allocation</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
441	Land off New Road, Hailey	<p>Deliverable</p> <p>The northern parcel of the site which currently comprises an area of cleared scrubland, relates well to existing residential development (from where access can also be achieved) and is therefore considered suitable for limited development. Development on the southern parcel of land would relate poorly to the existing settlement and is considered less suitable.</p>	<p>Small scale site which is considered suitable in part for development.</p> <p>Further work required to determine the extent of the developable area of the site.</p> <p>Land has been allocated in the parish of Hailey as part of the north Witney SDA. No further allocations considered appropriate given unresolved issues on this site.</p>
336	Land adjacent to British Legion Club, Kingham	See detail in section 7	See detail in section 7
321	Land off The Elms, Langford	<p>Developable</p> <p>The village has limited facilities and the site is suitable for limited development to meet local needs. An affordable housing scheme has recently been developed in the village and the need for more affordable housing is unlikely to arise until later in the plan period. There is a lack of sewage capacity which would need to be overcome for development to proceed.</p>	<p>Small scale site with limited capacity for residential development.</p> <p>Sensitive, relatively isolated and unsustainable rural location.</p> <p>Suitability of development in this location better assessed through planning application process as a windfall development.</p>
214	Land at Fairspear Road, Leafield	See detail in section 7	See detail in section 7
407b	Medlar Tree, Middle Barton	<p>Deliverable</p> <p>Potential scope for small-scale development effectively mirroring the recent housing development to the south. Would however be subject to potential loss of mature trees which is a potential constraint to development and capacity.</p>	<p>Small scale site. Allocation not necessary as impact on local infrastructure likely to be negligible.</p> <p>Development potential of site including impact on local landscape and character of area better considered through full planning application</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
344	Land adjoining A4095, North Leigh	<p>Developable in part</p> <p>Development has the potential to integrate well with the form of the village and the road and footpath network. It would be close to the primary school and has reasonable access to public transport and other village facilities. There would, however, be a landscape impact; special care would need to be taken of the rural setting of the Eynsham Hall woodland, the village and the A4095. This limits the extent of the developable area</p> <p>Because of the sensitivities of the site, only limited development could be accommodated on this site, most likely restricted to the north eastern part, where the impact of road noise would be limited, and where supplementary landscaping along the main road would help soften the built-form and add to local biodiversity. The land is not of high quality for agriculture. The potential has been recognised in the past by a Local Plan Inspector.</p>	<p>Site considered suitable in part for residential development.</p> <p>Further detailed work required to understand the extent of the developable area within the site to protect the character of the village and the setting of Eynsham Hall and gardens.</p> <p>Not considered appropriate to allocate the site at this time.</p> <p>Application for development on this site currently under consideration</p>
379	North Leigh Nursery	<p>Developable</p> <p>As a brownfield site, with development to the north and west and few constraints, this site has potential for re-development, including for a mixed-use scheme. However, it is in existing use and provides a useful local facility and employment; the potential is, therefore, likely to be only in the longer term. Access is also an important consideration.</p>	<p>Although location would be suitable for residential re-development, at the time of preparing the Plan, the land was in active use and there was no certainty about future availability.</p> <p>Not considered suitable for an allocation in the Local Plan due to questionable deliverability.</p> <p>Development potential of site including loss of community facility would be considered against criteria based policies of the Local Plan through a planning application.</p>
440	Land to the south and east of Charity Farm, Stonesfield	See detail in section 7	See detail in section 7

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	Reason for not allocating the site
135	Land west of North Farm, Stonesfield	See detail in section 7	See detail in section 7
152	Adj Marriott Close, Wooton	Developable Potentially suitable for a very limited number of dwellings as an extension of the recent RES site (subject to avoiding unreasonable loss of existing trees).	Site in a relatively isolated rural location with very limited capacity for residential development. Suitability of acceptable part of site better explored through planning application process with full consideration of trees, landscape and historic character.
173	Land at Hordley Farm, Wooton	Deliverable The site is in a relatively isolated rural location but there may be scope for limited conversion of existing traditional buildings to residential. The modern farm buildings would not be suitable. There would also be scope for a small-scale office conversion or combination of office and residential.	Site considered suitable for development but would be better considered through a planning application for the conversion of existing buildings rather than a site allocation.
251	Balliol Farm Buildings, Wooton	Deliverable Potentially suitable for very small-scale sympathetic conversion of existing traditional farm buildings to residential and/or business use.	Site considered suitable for development but would be better considered through a planning application for the conversion of existing buildings rather than a site allocation.

5.18 All other sites assessed through the SHELAA (2016) were found to be unsuitable or unachievable for the reasons set out within the assessment.

Oxfordshire Growth Board – Apportionment of Oxford’s Unmet Housing Need

- 5.19 In parallel to the preparation of the SHELAA during 2016 the District Council was pro-actively engaged with the other Oxfordshire authorities through the Oxfordshire Growth Board (OGB) to consider the most appropriate and sustainable way in which to apportion and meet Oxford’s unmet housing needs.
- 5.20 Following the publication of the Oxfordshire Strategic Housing Market Assessment (SHMA) in April 2014, the Oxfordshire Growth Board (OGB) in November 2014 commissioned a project team to address the unmet housing needs of Oxford. The Project Team met regularly to consider the implications of the SHMA and how best to meet the identified unmet housing need of Oxford.
- 5.21 Key workstreams co-ordinated by the OGB on behalf of the Oxfordshire local authorities included:
- Advice note on Oxford’s Development Capacity (SD17)
 - Oxford Green Belt Study (SD18)
 - Oxfordshire Spatial Options Assessment (SD14)
 - High level transport assessment of spatial options (SD19)
 - Education assessment of spatial options for Oxford’s unmet housing needs (SD20)
- 5.22 These workstreams were considered by the OGB Post SHMA Project Team in formulating the collective officer advice to the OGB on apportionment (SD21). A brief description of each workstream is set out below.

Advice note on Oxford’s Development Capacity (SD17)

- 5.23 An important first work stream of the Programme was to clarify the extent to which Oxford’s housing need that could be accommodated in Oxford City itself. This was done by reference to the published Oxford Strategic Land Availability Assessment (SHLAA), a study of the available housing capacity of Oxford commissioned by the City Council.
- 5.24 An independent consultancy, Fortismere Associates (FA) were appointed to review the Oxford City SHLAA and other related documentation. The aim was to secure agreement to a single figure or narrower range as a working assumption for the unmet housing need of Oxford City, in order to inform the assessment of the proposed spatial options.
- 5.25 Following consideration of the Fortismere report, at its meeting held in November 2015 the Oxfordshire Growth Board approved a working assumption of 15,000 dwellings as a benchmark for assessing the spatial options for growth.

Oxford Green Belt Study (SD18)

- 5.26 The Consultancy, Land Use Consultants (LUC) was commissioned to undertake an assessment of the Green Belt within Oxfordshire. The Study was overseen by a Steering Group comprising

officers of the local authorities. The overall aim of the Study was to assess the extent to which the land within the Oxford Green Belt performs against the purposes of Green Belts, as set out in paragraph 80 of the National Planning Policy Framework (NPPF).

- 5.27 The brief emphasised that the Study should not advise on the suitability or potential of land in the Oxford Green Belt for development. However, the outputs of the study, alongside other assessments will assist local authorities in considering the extent to which some existing Green Belt land could be used to accommodate sustainable forms, patterns and types of new development.
- 5.28 The study assessed the contribution that separate identified land parcels within the Green Belt make to the purposes of the Green Belt according to the five purposes of Green Belt suitability for the first time since the establishment of Oxfordshire Green Belt in the 1970s.
- 5.29 The study does not propose areas for release from Green Belt but does allow individual councils, alongside challenge from partners to consider whether Green Belt land could be included as part of the areas of search that formed the basis of the allocation of Oxford's unmet housing need. In this way the study will, in combination with the Strategic Options Assessment (see below) help to identify the potential, or not, for development, and the case for additional areas to be added to the Green Belt.

Oxfordshire Spatial Options Assessment (SD14)

- 5.30 A key early element of the Programme was the identification of areas of search as strategic options for growth by City and District partners. Initially, in accordance with the 'bottom-up' approach, this was left to the individual authorities to identify the strategic options within their own districts that would then be taken forward for further testing, though for South Oxfordshire and Vale of White Horse Districts, the initial set of options was prepared by the County Council.
- 5.31 A consultancy partnership, Land Use Consultants (LUC), and BBP Regeneration were commissioned to carry out a Spatial Options Assessment for meeting the Oxford's unmet housing need up to 2031. Their role was to test the strategic options identified against a number of agreed criteria to assess their 'relative' sustainability at a strategic level. This assessment would then help the OGB agree an appropriate apportionment of Oxford's unmet need between the various Local Planning Authorities. A full Sustainability Appraisal was not judged to be appropriate as this is not a statutory planning process.
- 5.32 These criteria included a number of sustainability issues such as infrastructure, water supply, flooding, green belt etc. Importantly it ensured a common approach was taken to the density of proposed options and also tested the suitability of the areas of search against the primary requirement of the Programme to meet the housing needs of Oxford City, for example by physical proximity or public transport links.
- 5.33 The agreed Methodology for the assessment included: -

- The development of an initial list of spatial options by each district, either by the districts themselves or the partners on their behalf.
- A Check and Challenge workshop on 30th October 2015, where the initial list was refined to a long list of potential strategic areas of search for growth which had a closer relationship to Oxford and were thus seen to be more credible options to consider through this process. This long list was agreed by all the partners to be taken forward for assessment in the Spatial Options Assessment Project.
- The testing by the consultants of the long list of potential strategic areas of search for growth against an agreed set of criteria.
- A Check and Challenge workshop to examine the results of the assessment process was also held on the 15th April 2016 to consider the emerging conclusions of the assessment.

- 5.34 The overall aim of the Spatial Options Assessment was to provide a criteria-based analysis of the spatial options for meeting Oxford's unmet housing need. The brief was to develop and implement a methodology for testing spatial options which can meet Oxford's unmet housing need, either in part or in whole, thus providing guidance and evidence to inform decisions on how this unmet need might best be apportioned across the county.
- 5.35 The Check and Challenge workshop on 30th October 2015 reviewed an initial list of options from partners. A long list of options was agreed for further detailed assessment. A number of options were unanimously agreed to be not worthy of detailed assessment either because they were poorly related to Oxford, were undeliverable, or were not individually of sufficient size. These included sites at places such as Appleford, Carterton, Faringdon, East Hanney, Grove and at Long Hanborough. This is referred to in the Officer Report to the Growth Board in September 2016 (SD21).
- 5.36 The LUC Spatial Options Study commenced with baseline economic, environmental, social and transport information being gathered and collated. This baseline informed the later assessment of spatial options, and helped to inform judgements on a comparative basis between each District about the likely effects of the options on social, environmental and economic issues in Oxfordshire.
- 5.37 LUC and BBP were asked to propose consistent assumptions to apply to the options covering for example density, affordable housing, infrastructure provision and development trajectories, this was to ensure they were considered in a consistent manner. This was because securing a comparative assessment on a District- by- District basis is difficult to achieve as each LPA uses slightly different assumptions for its Local Plan processes.
- 5.38 An assessment framework was developed by LUC and BBP in consultation with a project steering group, which included sustainability assessment criteria, criteria for assessing the deliverability and viability of options, and specific criteria relating to assessing landscape impact and the Green Belt. A scoring scale, similar to that which is commonly used in Sustainability Appraisals, was used to assess each spatial option against each criterion in the sustainability assessment framework.

- 5.39 Each of the 36 spatial options was assessed by LUC in terms of its likely effects on each sustainability, landscape and Green Belt assessment criterion. This was done initially through a desk-based approach concluding with a 'RAG' assessment (Red-Amber-Green) showing a range of anticipated effects from 'significantly negative' to 'significantly positive', to enable a comparative judgement to be reached. At the same time, the deliverability and viability assessment for each spatial option was carried out by BBP. Site visits were used to inform the sustainability and landscape sensitivity assessments although they were not used in the assessment against the Green Belt criterion as this has been the subject of a separate study.
- 5.40 Each of the spatial options was assessed against the range of assessment criteria grouped into four categories:
- Sustainability (comprising spatial relevance to Oxford, social and economic criteria, and environmental criteria).
 - Landscape.
 - Green Belt.
 - Deliverability and viability.

High level transport assessment of spatial options (SD19)

- 5.41 Consultancy Integrated Transport Planning Ltd (ITP) were commissioned to prepare a high-level assessment of the transport implications of development of 36 strategic sites in Oxfordshire that could potentially contribute towards Oxford City's unmet housing need up to 2031.
- 5.42 It was prepared in order to feed into an initial 'Check and Challenge' workshop on 15th April 2016 led by LUC as part of their wider work to consider the general viability of the 36 different areas of search for accommodating Oxford's future unmet housing need. Based on comments and questions at this workshop an updated high-level assessment was prepared for consideration at a Project Team meeting on 12th May 2016. The study was subsequently updated to include refined housing number trajectories (to 2031) and 30 minute travel time accessibility calculations for jobs in Oxford.
- 5.43 The Technical advice included the following:
- Maps showing the 36 areas of search considered, and the scale of potential housing development associated with each one.
 - A Red/Amber/Green analysis against the methodology agreed with the Oxfordshire Growth Board. Each area has also been assessed against a set of eight transport-related metrics.
 - A summary of key datasets and assumptions used to complete this assessment, with cross-references to the appended evidence base.
 - A summary of potential next steps that could be pursued in respect of defining packages of areas of search, by considering areas within known transport corridors to accommodate Oxford City's unmet housing need and supporting transport schemes.

Education assessment of spatial options for Oxford's unmet housing needs (SD20)

- 5.44 Oxfordshire County Council conducted a high level assessment of the implications for the provision of primary and secondary school places from the potential development of the 36 identified spatial options for accommodating Oxford's unmet housing needs which were generated through the Post SHMA Strategic Work Programme.
- 5.45 The report contained the following elements:
- A review of existing and projected school capacity, including new schools already planned to support growth allocated in existing and emerging local plans.
 - The location of the spatial options in relation to existing and already planned new capacity.
 - A summary of the issues impacting on planning and delivery of new schools provision.
 - The assumptions used in assessing the education implications of the spatial options and proposed provision.
 - A 'RAG' assessment of the education implications of the spatial options.
- 5.46 These assessments were used to help filter out spatial options which could lead to infrastructure carrying a higher risk of being financially unviable, being undeliverable due to reliance on other sites coming forward and/or of rendering development unviable due to cost per dwelling.

Post SHMA Project Team Report to Oxfordshire Growth Board Consideration (SD21)

- 5.47 The OGB Post SHMA Project Team drew together the conclusions of the spatial options assessment with the conclusions of the other OGB studies to assess the various options considered and arrive at a recommended final apportionment of Oxford's unmet housing need.
- 5.48 In relation to West Oxfordshire, the assessment process assessed six options in detail including:
- North east Witney
 - Land west of Downs Road, Witney
 - South Witney
 - North Eynsham
 - West Eynsham
 - Eynsham Park Estate nr Barnard Gate
- 5.49 Having regard to the spatial options assessment and other related workstreams the following summary conclusions were reached in the Officer Report to the OGB in relation to these six options (SD21).

TABLE 7: Officer report to the OGB – Summary Conclusions of Spatial Options Assessment

Site Option	RAG status	Explanation
North east Witney (1,100 dwellings)	R	This area was rejected on the basis poor performance against the spatial options assessment criteria and transport assessment due to the distance from Oxford and lack of either existing or proposed sustainable connectivity.
Land west of Downs Road, Witney (550 dwellings)	R	This area was rejected on the basis of poor performance against the spatial options assessment criteria and transport assessment due to the distance from Oxford and lack of either existing or proposed sustainable connectivity.
South Witney (1,050 dwellings)	R	This area was rejected on the basis poor performance against the spatial options assessment criteria and transport assessment due to the distance from Oxford and lack of either existing or proposed sustainable connectivity.
North Eynsham (2,200 dwellings)	G	The area of search scores well against the key criteria in the options assessment with all criteria scoring green. It performs less well against the transport assessment as existing but better against proposed sustainable transport proposals which led the Team to conclude that the area should score green.
West Eynsham (550 dwellings)	G	The area of search scores well against the key criteria in the options assessment, with all but one criteria scoring green. It performs less well against the transport assessment as existing but better against proposed sustainable transport proposals that led the Team to conclude that the area should score green.
Eynsham Park Estate nr Barnards Gate (2,200 dwellings)	R	Although this area of search is adjacent to other areas considered the score for this was different. Partly because of its proximity to parkland and partly because of a significantly poorer score for transport accessibility when compared to the other sites in Eynsham. The Team is also aware of the background issue of capacity if all three sites were to be brought forward. For these reasons a majority decision to score as red.

- 5.50 These overall conclusions ,together with the conclusions on the spatial options in the other Districts and the City, led to the following recommended apportionment of unmet need which was agreed at the meeting of the Oxfordshire Growth Board on 26 September 2016 by all parties except South Oxfordshire District Council.

TABLE 8 : Apportionment of Oxford’s unmet housing need

Authority	Proposed Apportionment
Cherwell	4,400
Oxford	550
South	4,950
Vale	2,200
West	2,750
Total	14,850

- 5.51 The Council considers that the overall process of joint working undertaken to arrive at this proposed apportionment has been robust and evidence based. Furthermore the Council considers the positive identification of land to the north and west of Eynsham to be robust and evidence based and in line with the Growth Board recommendations it has been further tested through the Local Plan process including the Sustainability Appraisal Addendum Report (CD10) the SHELAA (2016) updated Habitat Regulations Assessment (SD13) and other supporting technical evidence including transport (TRA5) flood risk (ENV9) Water Cycle Study Scoping Report (ENV11) viability (VIAB5 and VIAB6) the economy (ECON1) and settlement sustainability (OTH15).

Garden Village Expression of Interest

- 5.52 Whilst the joint working on the apportionment of unmet need was ongoing, the District Council submitted an expression of interest to Central Government in July 2016 in response to the Government’s locally led garden village initiative.
- 5.53 The expression of interest document outlined how a new settlement to the north of Eynsham could come forward to assist with the issue of unmet housing need in a sustainable location with relatively few constraints and a number of positive opportunities.

- 5.54 The expression of interest was submitted on the basis that the emerging work being co-ordinated through the Oxfordshire Growth Board suggested at the time that strategic scale development north of Eynsham performs strongly in terms of its spatial relationship to Oxford and other relevant considerations including committed strategic transport infrastructure.
- 5.55 The District Council was subsequently given Government backing in January 2017 and awarded funding to take the proposal forward.
- 5.56 Whilst not directly related to the Local Plan housing site selection process the award of garden village status confirms that there is considerable merit in the decision to propose a new settlement to the north of Eynsham to assist with Oxford's unmet housing need.

Assessment of Strategic Site Options

- 5.57 The new SHELAA and SA Addendum provided a comprehensive framework for assessing both strategic and non-strategic options in light of the increased housing target. As part of this process the findings of the assessments of strategic site options published in 2012, 2014 and 2015 were reviewed in order to determine both the extent to which the site areas/capacities of the four existing strategic development areas might reasonably be increased to accommodate more housing, and also whether any of the alternative strategic site options previously ruled out for development should now be allocated.
- 5.58 Revised assumptions on densities were applied to move from a general assumption of 30 dwellings per hectare to 35 dwellings per hectare or a site based figure. This showed additional capacity at East Witney. In North Witney following further detailed site assessment and a review of background material additional areas were added to the proposed allocation. In East Chipping Norton technical evidence on transport demonstrated the benefits of increasing the scale of the allocation in order to achieve a new link road which can remove some traffic from the town centre. Following further detailed site assessment and a review of background material additional areas were added to the proposed allocation.
- 5.59 The conclusion reached was that the size/capacities of three of the strategic sites could be increased as follows:
- East Witney – increased from 400 to 450 homes
 - North Witney – increased from 1,000 to 1,400 homes
 - East Chipping Norton – increased from 600 to 1,400 homes
- 5.60 It was also concluded that the reasons for rejecting the alternative strategic options at Witney and Carterton remained valid and could not reasonably be overcome and that as such those alternative sites should not be allocated at this stage. These conclusions were set out in the SHELAA/ SA and they informed the preparation of the Proposed Changes to the Local Plan and its accompanying officer report that were considered at Council in October 2016.

Sustainability Appraisal (SA)

- 5.61 To further inform the housing site selection process during the suspension of the Local Plan examination, the Council commissioned consultants Enfusion to prepare an addendum update of the Final Sustainability Appraisal (SA) report which was published in February 2015 (CD2 / CD2a) in support of the proposed submission draft Local Plan in March 2015 (CD1).
- 5.62 The SA addendum report provided an updated assessment against an agreed framework of SA objectives and decision aiding questions. The findings of the SA addendum report helped to shape the proposed modifications including the selection of sites.
- 5.63 It assessed a number of new or amended 'reasonable alternatives' including:
- Additional spatial strategy options (new village and growth along transport corridors)
 - Additional levels of housing growth (568 dpa, 635 dpa and 685 dpa)
 - Additional directions of growth at Witney (land west of Downs Road) and increased growth (east Witney and North Witney)
 - Additional directions of growth at Carterton (north east Carterton)
 - Increased growth at Chipping Norton (east Chipping Norton)
 - New strategic directions of growth at Eynsham (garden village to the north and urban extension to the west)
 - 15 non-strategic site options
- 5.64 It also assessed the implications of proposed modifications to other non-site related policies within the Local Plan as well as the potential cumulative effects of the local plan as proposed to be modified.
- 5.65 In Part I of his preliminary findings of December 2015 the Local Plan Inspector concluded that the final SA report (February 2015) was adequate in its general scope and approach. The SA addendum report has been prepared by the same consultants and is considered to be robust having regard to all reasonable alternatives. The Council intends to publish a separate note on the legal compliance of the SA addendum in response to issues raised during the matter 5 hearing session.

Habitat Regulations Assessment (HRA)

- 5.66 In further support of the site selection process the Council commissioned an update of its Habitat Regulations Assessment (March 2015). The updated study (SD13) published in October 2016 considered the likely significant effects of the Local Plan proposed modifications including the increases in the original pre-submission draft local plan strategic allocations, the incorporation of new strategic allocations at Eynsham in response to Oxford's unmet housing need and the inclusion of the 15 non-strategic site allocations.

5.67 The report concludes in similar fashion to the original HRA study that there is no prospect of a likely significant effect of the West Oxfordshire Local Plan on any European sites through any impact pathways except potentially air quality on the Oxford Meadows SAC. The study thus adopts a precautionary approach (pending further joint working on HRA across the Oxfordshire Housing Market Areas) assuming that an air quality effect may exist and that appropriate plan-level measures are needed to address the issue as set out in the proposed modifications.

Other Supporting Technical Evidence

5.68 In addition to the SHELAA (2016), the work undertaken through the Oxfordshire Growth Board, the SA and HRA, the Council commissioned and undertook a number of further evidence based studies to help inform the housing site selection process and the proposed Local Plan modifications in more general terms.

5.69 This additional evidence included the following:

- Strategic Development Area (SDA) Viability Update (VIAB5)
- Local Plan and CIL Viability Assessment – Second Update (VIAB6)
- Evaluation of Transport Impacts Technical Note (TRA5)
- Chipping Norton Transport Options Study (TRA6)
- Level 1 Strategic Flood Risk Assessment Update (ENV9)
- Witney Level 2 Strategic Flood Risk Assessment Addendum (ENV10)
- West Oxfordshire Water Cycle Study: Phase 1 scoping study (ENV11)
- Settlement Sustainability Report Update (OTH15)

Stakeholder and Member Engagement

5.70 A number of respondents have criticised the fact that the Council undertook no public consultation on the proposed modifications to the Local Plan prior to November 2016 when the 6-week period of statutory consultation took place.

5.71 The joint work being co-ordinated by the Oxfordshire Growth Board did not report until 26 September 2016. The Council sought to ensure that the proposed modifications were published as expediently as possible after the 26 September, thus the changes were reported to Cabinet and Council in October 2016 and published in November 2016 accompanied by an extensive programme of consultation including a series of well-attended public exhibitions.

5.72 In terms of Member engagement, a series of internal workshops were held with Councillors during 2016 to discuss the emerging changes to the plan including site allocations. As set out above, this led to formal decisions by Cabinet and Council in October 2016 to publish the proposed modifications in November 2016.

Summary

- 5.73 To summarise, the Council considers that it has responded positively and pro-actively to the Local Plan Inspector's preliminary findings of December 2015. During the suspension of the examination in 2016 the Council determined that its own housing requirement should be increased to 13,200 in line with the Oxfordshire SHMA (2014) and that additional provision should be made of a further 2,750 homes to assist with Oxford City's unmet housing need. The housing requirement has thus been increased significantly from 10,500 to 15,950 homes.
- 5.74 In Part 1 of his preliminary findings of December 2015 the Local Plan Inspector stated that if the housing requirement increases, then additional sites and/or changes to the existing site allocations will need to be made. In Part 2 of his preliminary finding the Inspector stated that in any further work the Council will need to include in this plan sufficient additional site allocations to support the delivery of an on-going 5 year supply and that as a minimum, allocations should ensure adequate delivery for sufficient time to allow for any subsequent plan to be adopted which made further allocations.
- 5.75 Through the preparation of the SHELAA (2016) the Council considered the extent to which the four strategic development areas identified in the pre-submission draft Local Plan (March 2015) could reasonably be increased in terms of size/developable capacity. Following further detailed site assessment increases in capacity were identified at East Witney and particularly at North Witney and East Chipping Norton.
- 5.76 The decision to increase the scale of development these sites has been made on the basis of a range of factors including the updated SHELAA (2016) previous strategic site assessments, Sustainability Appraisal, member engagement and other supporting technical evidence.
- 5.77 Two additional strategic sites have been identified to the west and north of Eynsham having regard to robust evidence prepared via the Oxfordshire Growth Board which has been further tested through the Council's own local plan process including the SHELAA (2016) Sustainability Appraisal, member engagement and other supporting technical evidence.
- 5.78 In addition, 15 non-strategic site allocations have been identified to help boost short-term housing land supply and to help ensure more certainty. These 15 sites have been drawn from the SHELAA (2016) and further considered through Sustainability Appraisal, member engagement and other supporting technical evidence.
- 5.79 The Council considers that the package of sites it has put together is justified and evidence based and sufficient to meet identified housing needs to 2031.
- 5.80 The need for additional allocations to meet longer-term housing needs beyond 2031 will be considered as part of the next Local Plan review or should the Local Plan Inspector conclude that the Council cannot demonstrate a five year housing land supply.

6. CONSISTENCY WITH THE OVERALL SPATIAL STRATEGY

6.1 The pre-submission draft Local Plan is based on the following settlement hierarchy:

- Main Service Centres
- Rural Service Centres
- Villages
- Small Villages, Hamlets and Open Countryside

6.2 The overall spatial strategy seeks to steer a significant proportion of future growth to the three main service centres of Witney, Carterton and Chipping Norton and a new village, which will help to meet Oxford City's unmet needs. This is then complemented by growth at the Rural Service Centres and Villages. A more restrictive approach is intended to apply to the small villages, hamlets and open countryside.

6.3 The housing site selection process followed by the Council has had full regard to the settlement hierarchy and proposed spatial strategy. Regard has also been had to the Council's evidence on the relative 'sustainability' of different settlements in terms of the availability of services and facilities.

6.4 This is illustrated in the table below which demonstrates that all of the proposed site allocations are located at main service centres, rural service centres and villages and in the majority of cases those settlements rank very highly in terms of the availability of services and facilities.

TABLE 9 : Site allocations and Settlement Sustainability

Site	Settlement Hierarchy 'Classification'	Settlement Sustainability Report 'Ranking' (out of 41) – unweighted analysis	Settlement Sustainability Report 'Ranking' (out of 41) – weighted analysis
East Witney	Main Service Centre	1	1
North Witney	Main Service Centre	1	1
Woodford Way Car Park, Witney	Main Service Centre	1	1
East Chipping Norton	Main Service Centre	2	2
REEMA North and Central, Carterton	Main Service Centre	4	4

Site	Settlement Hierarchy 'Classification'	Settlement Sustainability Report 'Ranking' (out of 41) – unweighted analysis	Settlement Sustainability Report 'Ranking' (out of 41) – weighted analysis
Milestone Road, Carterton	Main Service Centre	4	4
Land at Swinbrook Road, Carterton	Main Service Centre	4	4
West Eynsham	Rural Service Centre	3	3
West Oxfordshire Garden Village	Proposed Rural Service Centre	N/a	N/a
Land east of Woodstock	Rural Service Centre	5	5
Land north of Hill Rise, Woodstock	Rural Service Centre	5	5
Land north of Banbury Road, Woodstock	Rural Service Centre	5	5
Land east of Burford	Rural Service Centre	6	6
Land north of Jefferson's Piece, Charlbury	Rural Service Centre	7	7
Land at Myrtle Farm, Long Hanborough	Rural Service Centre	9	8
Oliver's Garage, Long Hanborough	Rural Service Centre	9	8
Land west of Minster Lovell	Village	11	11
Land north of Woodstock Road, Stonesfield	Village	27	22

Site	Settlement Hierarchy 'Classification'	Settlement Sustainability Report 'Ranking' (out of 41) – unweighted analysis	Settlement Sustainability Report 'Ranking' (out of 41) – weighted analysis
Land south of Milton Road, Shipton under Wychwood	Village	26	27
Former Airfield, Stanton Harcourt	Village	36	30

- 6.5 A number of respondents have questioned the amount of housing growth planned for Eynsham and the extent to which the proposals represent a departure from the submitted spatial strategy which had a particular focus on Witney, Carterton and Chipping Norton as the District's three main towns.
- 6.6 The Council does not accept that the planned growth at Eynsham represents a departure from the submitted strategy. Witney, Carterton and Chipping Norton still receive a significant proportion of future growth, but the spatial approach to help accommodate Oxford City's unmet needs reflects the need for this to be met on sites with a strong relationship with Oxford. Alternative options at Witney and Carterton have been considered through the site selection process including the work co-ordinated by the Oxfordshire Growth Board (OGB) in relation to unmet need.
- 6.7 These have been shown to be poorly related in spatial terms to Oxford and are thus not considered to represent 'reasonable alternatives' to the proposed growth at Eynsham. Similarly, further development at Chipping Norton would not be appropriate to assist with Oxford's unmet need given the poor spatial relationship between the two settlements.
- 6.8 It is also notable from the Council's settlement sustainability report that Eynsham ranks very highly in terms of available services and facilities ranking 3rd out of 41 on a weighted and unweighted basis behind only Witney and Chipping Norton and ahead of Carterton which ranks 4th despite its classification as a main service centre.
- 6.9 It is evident that Eynsham represents a sustainable location that is able to accommodate future growth and this gives further support to the Council's decision to focus the provision for Oxford's unmet housing need in this location.

7. DEVELOPMENT WITHIN THE COTSWOLDS AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

- 7.1 A number of respondents have questioned the Council's decision to allocate housing sites within the Cotswolds Area of Outstanding Natural Beauty (AONB). It has been suggested that as the proposals constitute 'major development' there must be 'exceptional circumstances' to justify them and they must be in the public interest.
- 7.2 The Council is fully aware of the great weight that must be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty and that the conservation of wildlife and cultural heritage are important considerations in these areas (NPPF paragraph 115).
- 7.3 In determining which sites to allocate within the Local Plan the Council has had full regard to the importance of the AONB and this was a key consideration in the assessment of housing site suitability within the SHLAA 2014 and the SHELAA 2016.
- 7.4 The Council considers that its approach to site selection including the allocation of sites within the AONB is entirely reasonable and justified for the reasons set out in the table below.

Table 10 : Suitable SHELAA sites within the AONB allocated as Non-Strategic Allocations in the Modifications to the Local Plan (November 2016)

Site Name / Location	SHELAA Assessment Published December 2016	AONB Assessment	Notes / Comments / Status of site June 2017
Land north of Jefferson's Piece, Charlbury	Suitable - The development of this site will have a limited impact on the environment and landscape. It has no significant environmental constraints and is well-screened from wider views. Access is a key consideration to be addressed.	<p>All settlements within the Burford / Charlbury sub area are within the AONB . Options for housing allocations outside of the AONB are extremely limited.</p> <p>Charlbury is one of the most sustainable settlements in the Burford / Charlbury sub area and is designated as a rural service centre.</p> <p>With this status it would be expected to accommodate some growth.</p> <p>Allocation of site will help to address affordable housing needs. 95 households , or 200 people, currently require affordable housing in Charlbury</p> <p>Impacts on the landscape character of the AONB will be mitigated by the relative containment of the site and relationship with existing neighbouring development</p>	

Site Name / Location	SHELAA Assessment Published December 2016	AONB Assessment	Notes / Comments / Status of site June 2017
Land north of Woodstock Road, Stonesfield	<p>Suitable in part - Planning permission has been granted for 37 houses on land to the south of Woodstock Road (15/03097/RES). Development on this site should be considered in the context of this neighbouring residential development and is now considered to form a logical extension to this part of the village. Potential for around 50 homes with provision of significant open space to mitigate the impact of development. Also potentially suitable for small-scale employment use potentially as part of a mixed-use scheme.</p>	<p>All settlements within the Burford / Charlbury sub area are within the AONB . Options for housing allocations outside of the AONB are extremely limited.</p> <p>Stonesfield is one of the more sustainable settlements in the Burford / Charlbury sub area.</p> <p>Site would form a logical extension to existing residential development in the village. Any potential impacts on the landscape character of the AONB could be mitigated by appropriate landscaping</p> <p>Allocation of site will help to address affordable housing needs. 38 households , or around 90 people, currently require affordable housing in Stonesfield</p>	<p>Current application for residential development consisting of 68 dwellings, public open space and new vehicular access onto Woodstock Road.</p> <p>17/01670/FUL</p>

Site Name / Location	SHELAA Assessment Published December 2016	AONB Assessment	Notes / Comments / Status of site June 2017
Land east of Burford	Suitable - The site is considered to be suitable for development subject to overcoming access constraints and provided development is designed to read as part of the existing settlement edge.	<p>All settlements within the Burford / Charlbury sub area are within the AONB . Options for housing allocations outside of the AONB are extremely limited.</p> <p>Burford is the most sustainable settlement in the Burford / Charlbury sub area and is designated as a rural service centre.</p> <p>With this status it would be expected to accommodate some growth.</p> <p>Allocation of site will help to address affordable housing needs. . 113 households, or around 260 people, currently require affordable housing in Burford. There is a particular need for couples and small family housing</p> <p>The site relates well to existing residential development to the east of the town. Impacts on the landscape character of the AONB can be mitigated through appropriate landscaping and ensuring that new development is well integrated with the rest of the settlement.</p>	<p>Outline planning application for up to 85 dwellings (Use Class C3), up to 60 extra care units (Use Class C2),</p> <p>17/00642/OUT</p>

Site Name / Location	SHELAA Assessment Published December 2016	AONB Assessment	Notes / Comments / Status of site June 2017
Land south of Milton Road, Shipton under Wychwood	Suitable - Relatively localised landscape impact, provides an opportunity to deliver additional parking for the school. Development in this location would relate well to the existing built form of the settlement. Suitable for residential development and potentially small-scale employment use as extension to adjoining business premises.	<p>All settlements within the Burford / Charlbury sub area are within the AONB . Options for housing allocations outside of the AONB are extremely limited.</p> <p>Shipton-under-Wychwood is one of the most sustainable settlements in the Burford / Charlbury sub area.</p> <p>Allocation of site will help to address affordable housing needs. . 42 households , or around 100 people, currently require affordable housing in Shipton under Wychwod</p> <p>Impacts on the landscape character of the AONB will be mitigated by the relative containment of the site and relationship with existing neighbouring development</p>	<p>Resolution to grant outline planning permission for 44 dwellings has since been secured.</p> <p>16/02851/OUT</p> <p>06/02/2017</p>

Table 11: Suitable SHELAA sites within the AONB, not allocated in the Modifications to the Local Plan (November 2016)

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	AONB Assessment	Reason for not allocating the site	Notes / Comments / Status of site June 2017
422	Land west of Burford Road, Chipping Norton	Deliverable The adjoining permitted development under construction to the north confirms that this is a sustainable location for new housing albeit lying within the Cotswolds AONB. There may be scope for further housing in the area to the south although this would need to be managed very carefully in terms of landscape and visual impact which is likely to impact on the number of new homes that can be provided. The site promoter has suggested around 300 homes in addition to the 228 under construction to the north. This level of development is likely to be too significant and create a harmful, cumulative impact. There may be scope for a much smaller scheme of around 100 new homes together with improvements to local services and facilities including sports provision.	Chipping Norton is designated as a Main Service Centre and will be the focus for a significant proportion of new development. Potential scale of development is such that it would have a significant detrimental impact on the landscape character of the AONB	Development in this location would constitute major development within the AONB and would need to be justified by exceptional circumstances.	
424	Land between Walterbush Road and Burford Road, Chipping Norton		Allocation of site would help to address affordable housing needs.	Land to the east of Chipping Norton lies outside of the AONB and has been identified as the preferred strategic development area.	
160	Land off Tanners Lane, Burford	Deliverable A modest scale of development could be capable of being successfully mitigated in terms of landscape and visual impact but	Site relates well to existing development on western side of town. Impact on landscape character of	Access considered key constraint to development. Access constraints better considered through full	Permission granted for 6 dwellings (19/12/2016) (16/00667/OUT) and counted in Council's housing land supply

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	AONB Assessment	Reason for not allocating the site	Notes / Comments / Status of site June 2017
		would be subject to overcoming access constraints.	<p>AONB could be mitigated by containment within well-defined field boundaries.</p> <p>Burford is the most sustainable settlement in the Burford / Charlbury sub area and is designated as a rural service centre.</p> <p>With this status it would be expected to accommodate some growth.</p>	<p>planning application in discussion with County Council.</p> <p>Site is too small for allocation</p>	calculations.
161a	Land south of Sheep Street, Burford	<p>Developable</p> <p>Sustainable location for development. Access possible off Sheep Street. Reduced scale of development to mitigate impact of development.</p>	<p>Burford is the most sustainable settlement in the Burford / Charlbury sub area and is designated as a rural service centre.</p> <p>With this status it would be expected to accommodate some growth.</p> <p>Impact on landscape character of AONB could be mitigated by relative containment of site and</p>	<p>Site located on the western side of Burford where landscape is relatively exposed and likely impact on AONB and historic character more pronounced.</p> <p>Alternative site allocated on Eastern side of Burford where development would relate better to existing residential development.</p>	

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	AONB Assessment	Reason for not allocating the site	Notes / Comments / Status of site June 2017
			<p>slope of land.</p> <p>Allocation of site would help to address affordable housing needs.</p>		
461	Burford Cottage Hospital, Burford	<p>Developable</p> <p>Previously developed site, suitable for conversion to residential use although currently in active health care use.</p>	<p>Burford is the most sustainable settlement in the Burford / Charlbury sub area and is designated as a rural service centre.</p> <p>With this status it would be expected to accommodate some growth.</p> <p>No impact on landscape character of AONB as development would comprise conversion of existing building.</p> <p>Allocation of site would help to address affordable housing needs.</p>	<p>Although location would be suitable for residential re-development, the building is in active use and there is no certainty about future availability.</p> <p>Not considered suitable for an allocation in the Local Plan due to questionable deliverability.</p>	
369	Land North of Little Lees, Charlbury.	<p>Deliverable</p> <p>Sustainable location for development with acceptable impact in terms of landscape and</p>	<p>Site relates well to existing development.</p> <p>Impact on landscape character of</p>	<p>Planning permission had already been granted for this site. Not necessary to</p>	<p>Permission granted for 22 dwellings subject to S106 on 04/01/2016. (15/00567/FUL) and</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	AONB Assessment	Reason for not allocating the site	Notes / Comments / Status of site June 2017
		deliverable access arrangements.	<p>AONB could be mitigated by containment within well-defined field boundaries and would make a contribution to affordable housing delivery.</p> <p>Charlbury is one of the most sustainable settlements in the Burford / Charlbury sub area and is designated as a rural service centre.</p> <p>With this status it would be expected to accommodate some growth.</p>	allocate.	counted in Council's housing land supply calculations.
377	Land at Churchill Farm, Kingham Road, Churchill	<p>Deliverable</p> <p>The site is potentially suitable for limited development as it is on brownfield land and is well located within the village. However this will need to be sympathetic to its edge of village location, the Conservation Area and the AONB.</p>	Churchill is one of the least sustainable settlements in the Burford-Charlbury sub-area	It was not considered necessary allocate land at Churchill with any new development to be delivered through the criteria based policies of the Plan.	<p>Permission granted for 10 dwellings subject to S106 (16/03533/FUL)</p> <p>Decision notice issued in May 2017 so not yet counted in Council's housing land supply calculations.</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	AONB Assessment	Reason for not allocating the site	Notes / Comments / Status of site June 2017
336	Land adjacent to British Legion Club, Kingham	<p>Deliverable</p> <p>A limited amount of development in the north western part of the site could be well integrated with the existing village and not harmful to the landscape or the setting of the conservation area. This would effectively maintain the building line of the existing properties in Orchard Way/Fowlers Road. Development of the wider site is likely however to have a more significant potentially harmful impact and would lead to further pressure for development of the adjoining site 182.</p>	<p>Kingham is one of the more sustainable settlements in the Burford Charlbury sub-area.</p> <p>Allocation of site would help to address affordable housing needs.</p> <p>Large scale allocation in this location not considered appropriate due to relative prominence of site and potential harm to landscape character of the AONB..</p> <p>Only part of site relates well to existing development where impact on landscape character of AONB could be mitigated.</p>	<p>Only small proportion of site considered suitable for development and therefore not suitable for allocation</p> <p>Further work required to determine the extent of the developable area of the site.</p>	
214	Land at Fairspear Road, Leafield	<p>Suitable in part and deliverable</p> <p>Potentially suitable for small-scale frontage development effectively extending the line of existing development along Fairspear Road. Provides an opportunity to improve the approach to the village from the north west.</p>	<p>Leafield is one of the least sustainable settlements in the Burford Charlbury sub area.</p> <p>Some limited development would relate well to existing linear pattern of development and impact on landscape character of AONB would be mitigated by</p>	<p>Some frontage development in this location is considered potentially appropriate but allocation not necessary.</p> <p>Small scale site not necessary to allocate.</p> <p>Development in this location would be counted towards</p>	

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	AONB Assessment	Reason for not allocating the site	Notes / Comments / Status of site June 2017
			containment of site.	windfall target	
440	Land to the south and east of Charity Farm, Stonesfield	<p>Deliverable</p> <p>The site is immediately adjacent to the recent approval for 37 houses at Charity Farm and this site should be considered in the context of this permission. As a result, it is considered to form a logical extension to the village.</p>	<p>Stonesfield is one of the more sustainable settlements in the Burford / Charlbury sub area.</p> <p>Site would form a logical extension to existing and proposed residential development in the village. Any potential impacts on the landscape character of the AONB could be mitigated by the containment of the site and well defined boundaries.</p> <p>Allocation of site would help to address affordable housing needs.</p>	<p>Sufficient land allocated at Stonesfield in addition to sites already permitted.</p> <p>Site is currently in agricultural use so there is a question over the deliverability of the site</p> <p>Development in this location would be considered as windfall development, subject to conformity with criteria based policies of the Local Plan</p>	
135	Land west of North Farm, Stonesfield	<p>Deliverable</p> <p>The site is relatively self-contained and modest residential development could be assimilated into the landscape without creating undue harm, subject to achieving suitable access. May also be suitable for small-scale business use although not promoted for</p>	<p>Stonesfield is one of the more sustainable settlements in the Burford / Charlbury sub area.</p> <p>Site would form a logical extension to existing and proposed residential development in the village. Any</p>	<p>Other land has been land allocated at Stonesfield.</p> <p>Cumulative impact of development in Stonesfield could potentially harm landscape character of the AONB in combination with</p>	<p>Current application for development of 16 dwellings 17/01403/FUL</p>

Site Reference	Site Name / Location	SHELAA (2016) Summary Conclusions	AONB Assessment	Reason for not allocating the site	Notes / Comments / Status of site June 2017
		such use and access again would be a key consideration as well as impact on adjoining occupants depending on the nature of any proposed use.	<p>potential impacts on the landscape character of the AONB could be mitigated by the containment of the site and well defined boundaries.</p> <p>Allocation of site would help to address affordable housing needs.</p>	allocated land and existing development commitments.	

- 7.5 The first relevant consideration is the amount of development being proposed within the AONB. Of the 20 additional proposed housing site allocations, only 4 are located within the AONB. These include:
- Land north of Jefferson's Piece, Charlbury (40 homes)
 - Land east of Burford (85 homes)
 - Land north of Woodstock Road, Stonesfield (50 homes)
 - Land south of Milton Road, Shipton under Wychwood (44 homes)
- 7.6 Cumulatively these allocations will deliver 219 new homes. Notably, this is a very small percentage (2.7%) of the overall total number of new homes expected to be delivered through the 20 housing allocations – 8,169 homes¹². Whilst there is likely to be further speculative 'windfall' development over the plan period within the AONB, the majority of schemes are likely to be small-scale and therefore not constitute 'major development'.
- 7.7 The second relevant consideration is the extent of the Cotswolds AONB within West Oxfordshire District. Around 34% of the District falls within the AONB and it covers almost all of the Burford – Charlbury Sub-Area.
- 7.8 The Council considers that it would be entirely inappropriate to restrict the search for potentially suitable housing sites to the 66% of the District that falls outside of the AONB.
- 7.9 Indeed to do so would be to entirely disregard the fact that within the Burford – Charlbury Sub-Area there are two Rural Service Centres – Charlbury and Burford and a number of villages with good services and facilities including Milton under Wychwood, Shipton under Wychwood, Stonesfield and Kingham.
- 7.10 To restrict the provision of new housing within the AONB would also run counter to national policy set out in the NPPF which supports thriving rural communities (paragraph 17) seeks to ensure that new housing development in rural areas reflects local needs (paragraph 54) and emphasises the importance of enhancing and maintaining the vitality of rural communities (paragraph 55).
- 7.11 The third key consideration is the extent to which, if one accepts the four proposed allocations comprise 'major development' exceptional circumstances exist to justify them and they can be shown to be in the public interest.

¹² Includes 6,450 homes from Strategic Development Areas (SDAs) and 1,719 homes from non-strategic sites

7.12 Paragraph 116 of the NPPF emphasises that consideration of such factors revolves around the following:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

7.13 Dealing briefly with each of these points in turn.

Need and Economic Impact

7.14 In terms of the need for the development there is no question that the District Council faces a significant challenge in terms of housing provision to meet identified need. This has been further exacerbated by the agreed apportionment of further housing to assist Oxford with its unmet housing need. In short there is an identified housing need and not to make allocations in 34% of the District because it falls within the Cotswolds AONB is not considered reasonable or appropriate particularly given the sustainable nature of a number of the settlements that fall within the Burford – Charlbury sub-area. Due to their scale, the proposed allocations in the AONB will also provide opportunities to secure much needed affordable housing the in the more rural part of the District.

7.15 The proposed allocations will also have a positive economic effect in terms of additional jobs created during the construction phase and support for local commercial services and facilities once the developments are occupied.

Cost of, and scope for, developing elsewhere or meeting the need in some other way

7.16 The Council has undertaken an exhaustive search for potentially suitable housing sites and concluded that to meet the identified housing requirement to 2031 some development is necessary within the Cotswolds AONB.

7.17 There are other sites available outside of the AONB and these have been allocated within the plan. Whilst the SHELAA (2016) identified a number of other potentially suitable sites there are good reasons why the Council decided that it was not appropriate to propose allocating them through its proposed modifications. Of the other sites considered outside the AONB, the Council has concluded through the SHELAA that they are not realistic, deliverable or suitable based on the information available at the time.

Detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated

- 7.18 The Council is confident that the four sites which have been allocated within the AONB are capable of being brought forward for development without having a detrimental impact on the environment, landscape or recreational opportunities that cannot be mitigated through appropriate design, layout and landscape treatment. As part of the preparation of the SHELAA (2016) further detailed site assessment took place to assess potential effects, including effects on the AONB. The Council is of the view that the particular nature and context of the four sites, together with the relatively modest scale of development proposed and the potential for positive enhancement through development, means that they will not cause harm to the landscape and scenic beauty of the AONB.

Summary

- 7.19 The Council considers that it has taken full account of the great weight that must be given to conserving landscape and scenic beauty within the AONB in terms of its site selection process. Only four sites have been allocated (out of a total of 20) and cumulatively they will deliver just 219 new homes – just 2.7% of the total level of housing provision identified through the proposed allocations (8,169).
- 7.20 The Council considers that to exclude the AONB from new housing site opportunities would run counter to the NPPF which emphasises the importance of meeting local housing needs in rural areas and promoting the vitality of rural communities.
- 7.21 Thirdly the Council considers that even if the sites in question were judged to be ‘major developments’, exceptional circumstances exist to support the proposed developments and that they would be in the public interest. West Oxfordshire has relatively high house prices and housing affordability is a major challenge across the District. Windfall development will deliver relatively little affordable housing. The Councils view is that these housing factors demonstrate that ‘exceptional circumstances’ can exist for the modest scale of development proposed in the four locations. These sites can also help to deliver much needed affordable housing to meet local needs.

8. SUMMARY AND CONCLUSIONS

- 8.1 The pre-submission draft Local Plan including proposed modifications (CD5) includes 20 housing site allocations. This is a significant increase from the original pre-submission draft Local Plan which included just four strategic site allocations.
- 8.2 The new allocations have been necessary to meet a significant increase in the overall housing requirement (including an additional apportionment of unmet housing need from Oxford) and also to provide additional certainty with regard to delivery of the overall housing requirement and within the short-term.
- 8.3 This paper has sought to explain the process which the Council went through first to arrive at the four strategic sites identified in the original pre-submission draft local plan and then how additional housing sites were identified in the proposed modifications.
- 8.4 The Council considers that the approach it has taken has been robust and transparent. Key elements of the site selection process up to publication in March 2015 included the following:
- SHLAA 2014
 - Assessment of Strategic Site Options 2012, 2014, 2015
 - Sustainability Appraisal
 - HRA
 - Other Supporting Technical Evidence
 - Stakeholder and Member Engagement
- 8.5 Further to the suspension of the Local Plan examination in January 2016 the Council sought to undertake an exhaustive search for additional development opportunities which included consideration of the size and capacity of the existing site allocations as well as the potential for new site allocations to be made (both strategic and non-strategic).
- 8.6 Key elements of the site selection process leading up to the proposed modifications in November 2016 included the following:
- SHELAA 2016
 - Oxfordshire Growth Board – Apportionment of Oxford’s unmet housing need
 - Garden Village Expression of Interest
 - Assessment of Strategic Site Options 2012, 2014, 2015
 - Sustainability Appraisal
 - HRA

- Other Supporting Technical Evidence
- Member Engagement

8.7 The Council considers that it has adopted a robust and evidence based approach towards the selection of housing sites within the Local Plan whilst seeking to:

- Address a significant increase in the overall housing requirement;
- Address unmet housing need from Oxford;
- Spread housing delivery over the plan period to ensure continuous supply by identifying an appropriate package of larger and smaller sites;
- Ensure consistency with the overall spatial strategy;
- Minimise the need for development within the Cotswolds AONB whilst recognising that some development is necessary; and
- Realise the benefits and economies of scale that are associated with larger strategic sites such as the provision of additional affordable housing, strategic infrastructure and improved viability.