Dear Astrid,

**Re: Consultation on Chipping Norton Neighbourhood Development Plan pre-submission document**

Thank you for consulting the County Council on the pre-submission document of Neighbourhood Plan for Chipping Norton.

We believe that communities should have the freedom to develop their own plans providing they conform to the relevant local plan and they follow the process of public engagement and examination which the district council helps to administer.

Therefore we are keen not to unnecessarily interfere in the development of Neighbourhood Plans. However we do need to ensure the plans do not put unrealistic service or financial demands on the County Council. Hence it is important that the impacts of the developments proposed are mitigated and that any infrastructure requirements are fully funded by the developments individually or collectively. Infrastructure requirements and aspirations identified need to be deliverable directly or indirectly through development.

We have the following comments to make on the plan:

**Section 3: Chipping Norton Today**

Paragraphs 3.3 – 3.5 refer to the landscape setting of the western and northern parts of the town but there is no mention of the landscape setting for the eastern/north eastern parts of the town. It would seem sensible, in describing Chipping Norton today, to describe the whole setting of the town rather than just those parts designated as an Area of Outstanding Natural Beauty.

Paragraphs 3.18 – 3.20 does not mention Chipping Norton’s place on the Oxfordshire highway network, e.g. A44. We suggest that this is included within the text.

**Section 6 – Master Planning**

**Policy M1**
The principle of encouraging the provision of new employment land is supported. It would be helpful if a table could be provided (in the lower case text following the policy) setting out the calculation that sits behind the 15.17 hectares figure quoted in the policy. If it is simply the total site area of those sites identified on figure 6.1 then it would also be helpful if this could be clarified.
It would also be helpful if the growth rate (last sentence of the policy) could also be clarified. Increasing ‘in line’ suggests proportionate growth but no rate is given, leaving it open to interpretation.

**Policy M6**
Whilst the County Council supports the principle of brownfield redevelopment, the link at paragraphs 6.25 and 6.28 requires clarification. The Pillars site is identified in the WODC SHLAA (site 290) as being part Greenfield, part brownfield, with a capacity for 15 dwellings on the site of the house and workshops only. The remainder (the largest part) of the site is Greenfield and the SHLAA indicates that it ‘provides an important part of the rural approach to the town’. The conflation of the term ‘vacant site’ with the term ‘brownfield site’ (6.25 and 6.28) is misleading, as is Figure 6.5 as a consequence.

**Policy M9 & M10**
The County Council welcome the intention to retain existing trees, hedgerows and habitats as part of proposed developments. It should be noted however that where allocated development sites require the removal of existing landscape features such as trees and hedgerows, policies M9 & M10 should be drafted so as to facilitate this taking place, to the extent that their removal is necessary in order to facilitate the development.

**Section 7: Transport and Movement**
The County Council considers that a policy needs to be included within the Transport and Movement section regarding HGV movements and routing for all new developments. Proposals for new employment developments should take into account if any HGV’s will be making deliveries to / from the site, how many times per day / week and what route they will be taking (potentially through the town).

Paragraph 7.2 - Before implementing an environmental weight limit, the County Council will first need to change the status of the A44 - seeking to remove primary route status. Only then can an environmental weight limit be implemented. However, it needs to be understood that environmental weight limits do not ban all vehicles as some HGV's can be granted exemptions due to the nature of what they are transporting and where they are transporting the stock to.

Paragraph 7.4 – Whilst there will no longer be an area strategy for Chipping Norton, the County Council, as Highway Authority, will work with the District and Town Councils to explore highway improvements to support expected growth. However, the resources that can be given by the County Council cannot be confirmed at this time due to the changing pressures within the organisation.

Paragraph 7.29 – The County Council requires further explain of what is meant by 'traffic - free corridor' mentioned here.

**Policies T1 to T9**
Any policy that refers to development that needs to provide mitigation measures or improve accessibility must include the words "from planning obligations or CIL".

**Policy T6**
The County Council considers that it would be inappropriate for landowners/developers to be required to provide a parking area for buses operated by a private company. It is essentially a matter of the bus company to identify an alternative secure parking area should their existing parking area on the former Parker Knoll site be re-developed. This may involve negotiations.
with landowners and developers to acquire a site (freehold or leasehold) at market rents or land values, but it is not appropriate to oblige “any developments along or off London Road” to secure this alternative provision, since it is essentially a private commercial matter. Furthermore this requirement would be unlikely to satisfy the Regulation 122 tests.

Section 9: Building Design and Use

Policy B3
Whilst the County Council has no concern with the objective of the policy, there is a risk that this could end up being inconsistent with the approach adopted elsewhere in the District and therefore it would be better to rely on the District-wide interpretation.

Policy B4
The objective of increasing the choice of different types of housing, including specialist housing, accessible housing and housing that offers people the opportunity to move into more managed accommodation is strongly supported.

Policy B6
This policy conflicts with draft WODC core strategy policy H5 which contains a threshold of 100 dwellings. The policy is unnecessary as it duplicates the Local Plan policy.

Policy B12
Introducing an obligation upon development to demonstrate that there is adequate water supply and sewage infrastructure to accommodate new development runs counter to the requirement in paragraph 162 of the National Planning Policy Framework. That states that planning authorities should work with other authorities “and providers” to assess the quality and capacity of water supply and waste water/treatment infrastructure “and its ability to meet forecast demands”, and furthermore that local planning authorities and providers should “take account of the need of the strategic infrastructure within their areas.

The wording in the NPPF continues a historical obligation (found in PPS12 and its predecessor, PPG12) on infrastructure providers to ensure that sufficient capacity is available at the time it is needed to meet growth requirements in Plan areas.

Therefore it is recommended that the policy be amended to ensure that the obligation to demonstrate adequate water supply and sewerage infrastructure capacity exists is placed on both the infrastructure providers and the developers.

If you have any questions on our response to this consultation, please contact me.

Yours faithfully,

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