1.1 The District Council welcomes the opportunity to comment on the formally published version of the Chipping Norton Neighbourhood Development Plan (NDP). Officers have worked closely with the NDP steering group to help ensure that the final draft version of the plan is consistent with the adopted and emerging West Oxfordshire Local Plans as well as national policy and guidance.

1.2 The District Council’s comments are set out below in the same order as the plan itself for ease of reference. Some general comments are set out by way of a summary at the end.

Section 1 – Introduction

1.3 The decision to extend the plan period to 2031 is supported. This will ensure consistency with the emerging Local Plan, the pre-submission draft version of which was published in March 2015.

Section 2 – National and Local Planning Context

1.4 This section provides a very useful overview of the planning policy context within which the NDP sits. In particular, the relationship with the adopted West Oxfordshire Local Plan and the emerging West Oxfordshire Local Plan to 2031. Although the new local plan is yet to be considered at independent examination and may therefore be subject to change, it is appropriate for the NDP to have regard to the draft policies and proposals set out within it.

1.5 The explanation provided in relation to the presumption in favour of sustainable development and the relevant key components is considered particularly useful.

Section 3 – Chipping Norton Today

1.6 This section provides a very useful overview of Chipping Norton’s key characteristics and provides valuable context for the remainder of the plan. In terms of travel to work (paragraph 3.16) it may be worth noting that there has been a modest increase in the number of employed residents working outside Chipping Norton since the 2001 Census.

1.7 In terms of transport, it would be useful to highlight the fact that a key issue of local concern is the number of HGV movements through Chipping Norton – a contributory factor to the high levels of nitrogen dioxide referred to in paragraph 3.19.

1.8 In relation to the local economy, it would be useful to refer to the relatively limited availability of employment land at Chipping Norton. This is highlighted in the pre-submission draft Local Plan and supporting evidence base as a key issue for the town.
Section 4 – Community Engagement

1.9 This section provides a useful overview of the key issues arising through previous consultation on the NDP. The District Council is aware that the plan has been the subject of extensive engagement with local people and other consultees which has helped to identify the key issues to be addressed.

Section 5 – Vision and Objectives

1.10 The plan’s vision is supported in principle. It is largely consistent with the vision for Chipping Norton set out in the pre-submission draft Local Plan with particular emphasis on social and economic well-being and protection of the town’s distinct environment.

1.11 The 10 proposed objectives are also supported in principle. The key themes identified appear sensible and are clearly derived from the foregoing contextual information. The protection and provision of employment land is consistent with the emerging Local Plan.

1.12 In relation to the town centre objective (OB2) it would be useful if this included reference to the function and/or vitality of the town centre which is as important as its character and appearance.

1.13 The design objective (OB7) could be taken further with development being expected not only to respect the local vernacular but also to make a positive enhancement.

1.14 Finally, in relation to the community facility objective (OB6) whilst the principle of securing high quality open space and recreational facilities as an integral part of new development is supported, it should be recognised that this will not always be possible for smaller-scale developments which instead will make an appropriate contribution for example through the Community Infrastructure Levy (CIL) once introduced.

Section 6 – Masterplanning

1.15 Policy M1 is supported in principle in seeking to encourage new employment land provision in appropriate locations. The proposed criteria against which proposals will be assessed are considered reasonable and robust. The provision of additional employment land will help to stem the increasing trend towards out-commuting from the town.

1.16 The approach to safeguarding employment land is appropriate and consistent with the pre-submission draft Local Plan insofar as there is a general expectation that sites will be retained in employment use unless it can be demonstrated that they are no longer needed/suitable or the replacement use would offer a significant benefit. This is considered to provide an appropriate degree of flexibility in line with the NPPF.

1.17 Policy M3 dealing with the provision of play and activity space is supported in principle. The use of a specific threshold for on-site provision (50 dwellings) is useful but the policy or supporting text could usefully introduce some further flexibility as there may be instances where a smaller development scheme is able to make direct provision (on or off-site) rather than through a financial contribution.

1.18 The same principle applies to Policy M4 which uses the same 50 dwelling threshold.
1.19 Policy M5 is supported in principle and the proposed strategic allocation east of the town clearly provides a good opportunity to deliver a new park for the town. Given that the allocation is yet to be confirmed and no firm proposals have been tabled, the reference to ‘other opportunities’ being explored is welcome.

1.20 Policy M6 and preference expressed for the re-use of previously developed land is supported. The supporting text recognises that some development of greenfield land will be needed but giving priority to previously developed sites (provided they are not of high environmental value) is considered entirely reasonable and consistent with the NPPF. Figure 6.5 illustrating the location of current and soon to be vacant sites within the town is likely to become quickly out of date and should perhaps be excluded from the plan.

1.21 Policies M7 – M11 are all supported in principle.

1.22 In relation to Policy M9 the support expressed for the provision of natural planting and habitat is welcome but such provision need not necessarily be used to provide a ‘buffer’ between developments which in some instances may reduce the ability of the new development to integrate with the existing built form.

1.23 It may therefore be preferable to state something along the following lines:

‘Strong support will be given to the inclusion of new areas of natural planting and habitat including as part of new developments. This will help to provide wildlife corridors and where appropriate, screening to help mitigate the visual and amenity impact of development’.

1.24 As a general observation, the references provided to relevant sections of the NPPF and West Oxfordshire Local Plans that follows the supporting text of each policy is very useful as is the cross-referencing to the relevant NDP objective/s.

Section 7 – Transport and Movement

1.25 Policies T1 – T3 are supported in principle.

1.26 In relation to Policy T2 it may be appropriate to strengthen the wording to be clear that if an acceptable level of traffic impact cannot be mitigated through additional infrastructure, the proposal will be resisted.

1.27 Policies T4 – T6 are also supported in principle. It should be noted in relation to Policy T5 that certified self-build projects will not be required to pay the Community Infrastructure Levy (CIL) once introduced. Furthermore, recent changes to national policy confirm that small-scale residential schemes of 10 units or less will not be required to make ‘tariff-style’ contributions through planning obligations. It should also be noted that at present the Council is not proposing to charge CIL on all non-residential developments. Only A1 – A5 uses will be charged and these will often fall below the specified 1,000m² threshold.
It may therefore be appropriate to amend the policy along the following lines:

‘Provision for enhanced public transport will be sought from residential developments (except certified residential self-build) and non-residential developments as appropriate, including through the use of planning obligations and/or CIL’.

Policies T8 and T9 are both supported in principle.

**Section 8 – Town Centre**

In relation to paragraph 8.1 it would be useful to explain what the projected increase in retail expenditure means in terms of the additional retail floorspace that could be supported in the town both for food and non-food retailing (expressed in the form of m² for example).

Policies TC1 – TC4 are supported in principle in particular the desire to improve the availability and functionality of parking in the town which is recognised as a key issue in the pre-submission draft Local Plan.

Policies T5 and T6 are also supported. Town centre vitality and viability is a central element of national policy and the adopted and emerging West Oxfordshire Local Plans. Policy TC6 is consistent with the approach to retail and other town centre uses set out in the pre-submission draft Local Plan.

The recognition given to permitted development rights at paragraph 8.17 is sensible as there will be some instances where planning permission is not needed for a change of use.

**Section 9 – Building Design and Use**

Policies B1 and B2 are supported in principle and are considered to be consistent with national policy and the adopted and emerging West Oxfordshire Local Plans.

Historic England has made numerous representations on the emerging Local Plan and it is likely that the Historic Environment section will be amended. It is unlikely, however, that this will materially affect Section 9 of the NDP. One issue that is too late for the NDP to consider is their request for a policy or policies to address issues such as important views or tall buildings, and also heritage assets at risk. This could be considered through any future review of the NDP.

A minor comment made by Historic England is that, for consistency with the NPPF, heritage assets should be ‘conserved’, rather than ‘preserved’. This affects these parts of the NDP:

- Para 9.4 Replace ‘preserved’ with ‘conserved’
- Policy B2 Replace ‘preserved’ with ‘conserved’
- Para 9.9 Replace ‘preservation’ with ‘conservation’

Policy B3 is also supported. The provision of affordable housing is a key issue across the District including Chipping Norton. The policy approach taken is consistent with national policy and the emerging pre-submission draft Local Plan.
1.38 The preference for affordable housing schemes that meet the housing needs of those with connections to Chipping Norton is acknowledged, however whilst preference can be given to such applicants by way of the Council’s allocations policy to a certain extent, there will be a requirement to ensure that any allocations comply with the Housing Act 1996, which stipulates that reasonable preference must also be given to assisting those in greatest housing need.

1.39 Policy B4 is also supported in principle. The pre-submission draft Local Plan emphasises the importance of providing a mix of residential accommodation to meet the needs of different people and the policy is consistent with that approach. The NPPF also emphasises the importance of housing mix.

1.40 Policy B5 is also supported in principle.

1.41 In discussing the need for smaller housing units in the future (paragraph 9.24) reference is made to the District Council’s 2011 housing needs assessment. It should be noted and referenced in the NDP that the more recent Oxfordshire Strategic Housing Market Assessment (SHMA) identifies a different pattern of future dwelling sizes required which highlights the need to provide a balanced mix of dwelling types and sizes.

1.42 Policy B6 is supported in principle. The provision of additional self-build opportunities is consistent with national policy and the Government’s policy objectives. It should be noted that the proposed threshold of 50 dwellings (at which point developments will be expected to provide a percentage of self-build) is lower than the threshold of 100 dwellings used in the Local Plan.

1.43 The adoption of a lower threshold would need to be justified through appropriate evidence.

1.44 Policy B7 is also supported in principle. The differences between the policy and that which is set out in the pre-submission draft Local Plan are noted and will need to be justified at examination (e.g. the requirement to complete construction within 3 years).

1.45 Policies B8 – B12 are all supported in principle.

1.46 In relation to Policy B9 consideration should be given as to whether it is reasonable to expect development to achieve the ‘highest possible’ energy efficiency standards which would have an effect on viability and potentially deliverability. It may be preferable to state that development will be expected to achieve ‘a high standard’ of energy efficiency.

1.47 Furthermore, it is considered that some of the wording of Policy B12 would be better located in the supporting text to make it more succinct for example reference to the fact that Chipping Norton is underlain by a Principal Aquifer.

Summary

1.48 In summary, the Chipping Norton NDP is considered to be well-written, following a logical structure and providing clear justification for the policies contained within it. Subject to the suggested amendments outlined above, it is considered that the plan represents a sound
basis upon which to guide future development at Chipping Norton alongside the West Oxfordshire Local Plan and national policy/guidance.